

Bacteria TMDL for Beaverdam Creek Bedford County, Virginia

Submitted by

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Executive Summary

This report presents the development of a Bacteria Total Maximum Daily Load (TMDL) for the Beaverdam Creek watershed. The Beaverdam Creek watershed is located in Bedford County in the Roanoke River Basin (USGS Hydrologic Unit Code 03010101). The waterbody identification code (WBID, Virginia Hydrologic Unit) for Beaverdam Creek is VAW-L07R.

The impaired segment is 5.58 miles in length. The impairment begins one half mile above Route 24 and ends at the impounded waters area of Beaverdam Creek at river mile 2.78. The Beaverdam Creek watershed is depicted in Figure 1.

The drainage area of the Beaverdam Creek watershed is approximately 27.2 square miles. The average annual rainfall as recorded at Bedford, Virginia (~12 miles northeast of study area) is 41.87 inches. The watershed study area is approximately 17,427 acres, which is predominately forested (67 percent), with the majority of the remaining area in agriculture (29 percent). The remaining two percent of the watershed consists of residential areas, commercial, wetlands, emergent herbaceous and open water. A map of the distribution of land use in the watershed indicates that streamside land use is mostly forested in the lower reaches of Beaverdam Creek. Agricultural land tends to be located closer to the stream in the middle and upper reaches of Beaverdam Creek.

Beaverdam Creek was listed as impaired on the 1999 Federal Consent Decree as a 1998 Attachment B station for fecal coliform bacteria and is listed on the 1998, 2002, and 2004 303(d) Total Maximum Daily Load Priority List and Report on Impaired Waters (Virginia Department of Environmental Quality 1998, 2002, & 2004) due to violations of the State's water quality standard for fecal coliform bacteria. Out of 23 samples collected during the 2002 assessment period, 3 samples exceeded the water quality standard for fecal coliform at station 4ABDA003.63.

According to Virginia Water Quality Standards (9 VAC 25-260-10A), "all state waters are designated for the following uses: recreational uses (e.g., swimming and boating); the propagation and growth of a balanced indigenous population of aquatic life, including game fish, which might be reasonably expected to inhabit them; wildlife; and the production of edible and marketable natural resources (e.g., fish and shellfish)."

As indicated above, Beaverdam Creek must support all designated uses and meet all applicable criteria. Beaverdam Creek does not currently support primary contact recreation.

The load-duration approach is used to develop the TMDL for the study watershed.

The assessment of bacterial sources involves estimating loads from various sources in the watershed. It was accomplished by determining the relative contribution by these sources using Biological Source Tracking (BST) methodology. A total of 12 ambient water quality samples were collected on a monthly basis from July 2004 to June 2005 for BST analysis. The results indicate that the majority of bacteria are coming from anthropogenic sources. Four categories of sources were considered: human, pet, livestock and wildlife. The analyses determined the relative contribution of all bacteria by these sources. The data indicated that on a weighted-average basis, relative contributions of bacteria are – 15% by human, 21% by pet, 27% by livestock, and 37% by wildlife. Fecal and *E.coli* bacteria were also enumerated as part of the BST analyses.

The bacteria loads in the study watershed were calculated for point source and non-point sources. The study area has two permitted discharges for bacteria. Total annual fecal productions were calculated separately for non-point sources (human, pets, livestock, and wildlife). Data on population density and waste production by septic systems, pets, livestock and wildlife were collected from various sources, and total fecal productions were calculated with appropriate unit conversions.

The load-duration method employs an entire stream flow record to provide insight into the flow conditions under which exceedances of the water quality standard occur. The flow-duration curve using historical flow data collected at the USGS gaging station (#2022500) was developed. The load-duration curve was then developed by multiplying each flow level along the flow-duration curve by the applicable water quality standard and required unit conversions. Each water quality observation is then assigned to a flow interval by comparing the date of each water quality observation to the flow record of the reference stream. The stream flow from the date of the water quality observation is then used to calculate a stream flow and flow-duration interval for the stream. The loads on the load-duration curve are multiplied by 365 days/year to determine the annual loads. Fecal coliform data was converted to *E. Coli* using a translator equation developed based on data sets from the Virginia Department of Environmental Quality's (DEQ) statewide monitoring network. The observed loads were plotted on the load-duration curve to determine the number and pattern of exceedances of water quality standards (TMDL).

The results indicated that the highest exceedance of the water quality standard occurred at a transitional flow that has been exceeded approximately 50% of the time (~10.5 cfs). This represents the flow condition under which the largest bacteria reduction is required in order to meet water quality standards. The translated load at this flow condition is 3.56×10^{14} cfu/yr. In order to meet the instantaneous *E. Coli* water quality standard of 235 cfu/100mL, this load would have to be reduced by 94% to an allowable load of 2.19×10^{13} cfu/yr. The allowable load is simply the *E. coli* standard multiplied by the applicable flow condition with respect to the proper unit conversions.

For the Beaverdam Creek watershed, the average annual *E. coli* load is 7.24×10^{14} cfu/yr, and the TMDL under average annual flow conditions is 4.46×10^{13} cfu/yr. These values are used to calculate required reductions. By subtracting the waste load allocation (known value) from the TMDL (as computed), and the implicit margin of safety, the load allocation was determined. These values are presented in Table E1.

Table E1. Average annual *E. coli* loads and TMDL for Beaverdam Creek watershed (cfu/yr)

WLA ¹	LA	MOS	TMDL
1.39×10^{10}	4.46×10^{13}	(implicit)	4.46×10^{13}

¹ The point sources are discussed in section 5.2.

The WLA represents <1% of the TMDL load for Beaverdam Creek. The required reduction of 94% is to be applied to each of the four non-point sources identified in the Bacteria Source Tracking (BST) analysis section.

The Beaverdam Creek TMDL development presented in this report is the first step toward the attainment of water quality standards. The second step is to develop a TMDL implementation plan, and the final step is the field implementation of the TMDL to attain water quality standards.

The Commonwealth intends for this TMDL to be implemented through a process of phased implementation of best management practices (BMPs). The development of the Beaverdam Creek TMDL requires a 94% reduction in non-point source loading in order to attain a 0% violation of water quality standards. In order to evaluate interim reduction goals for a phased implementation plan, several reduction levels (80%, 70%, and 60%) and their associated violation rates were assessed. Reduction curves similar to the maximum exceedance/reduction curve were plotted and are presented in this report.

Results also indicate that approximately 71% of the violations occurred during times of precipitation and increasing stream flow or just after a precipitation event with stable or decreasing stream flow. This suggests that those violations could be related to runoff events. Among some of the BMPs effective in reducing bacteria runoff from such precipitation events include: riparian buffers zone, retention

ponds/basins, range and pasture management, and animal waste management. Detailed lists of BMPs and their relative effectiveness will be included in the eventual TMDL implementation plan for the watershed.

The development of the Beaverdam Creek TMDL would not have been possible without public participation. A public meeting was held in Moneta, Virginia on March 14, 2006 to discuss the process for TMDL development and the source assessment input. Nine people attended. Copies of the presentation materials and the draft TMDL report were available for public distribution. The meeting was public noticed in the Virginia Register. There was a 30 day-public comment period and zero written comments were received.

1. Introduction

Section 303(d) of the Clean Water Act and US Environmental Protection Agency's (EPA's) Water Quality Planning and Management Regulations (40 CFR Part 130) require states to develop Total Maximum Daily Loads (TMDLs) for waterbodies which are exceeding water quality standards. TMDLs represent the total pollutant loading that a waterbody can receive without violating water quality standards. The TMDL process establishes the allowable loadings of pollutants for a waterbody based on the relationship between pollution sources and in-stream water quality conditions. By following the TMDL process, states can establish water quality based controls to reduce pollution from both point and non-point sources to restore and maintain the quality of their water resources (EPA, 1991).

The Commonwealth of Virginia's (Virginia's) 1997 Water Quality Monitoring, Information, and Restoration Act (WQMIRA) codifies the requirement for the development of TMDLs for impaired waters. Specifically section § 62.1-44.19:7 C states:

"The plan required by subsection A shall, upon identification by the Board of impaired waters, establish a priority ranking for such waters, taking into account the severity of the pollution and the uses to be made of such waters. The Board shall develop and implement pursuant to a schedule total maximum daily loads of pollutants that may enter the water for each impaired water body as required by the Clean Water Act. "

The EPA specifies that in order for a TMDL to be considered complete and approvable, it must cover the following eight elements:

1. It must be designed to meet applicable water quality standards,
2. It must include a total allowable load as well as individual waste load allocations and load allocations,
3. It must consider the impacts of background pollution (in the case of Beaverdam Creek this is wildlife),
4. It must consider critical environmental conditions or those conditions (stream flow, precipitation, temperature, etc.) which together can contribute to a worst-case exceedance of the water quality standard,
5. It must consider seasonal variations which together with the environmental variations can lead to a worst-case exceedance,
6. It must include an implicit or explicit margin of safety to account for uncertainties inherent in the TMDL development process,
7. It must allow adequate opportunity for public participation in the TMDL development process,
8. It must provide reasonable assurance that the TMDL can be met.

The following document details the development of a bacteria TMDL for Beaverdam Creek which was listed as a 1998 Attachment B station on the 1999 Federal Consent Decree and listed as impaired on Virginia's 1998, 2002, and 2004 303(d) Total Maximum Daily Load Priority List and Report on Impaired Waters (DEQ, 1998, 2002, & 2004) due to violations of the State's water quality standard for fecal coliform bacteria. Approximately 5.58 miles of Beaverdam Creek were listed as impaired due to a violation of Virginia's water quality standard for fecal coliform bacteria.

A glossary of terms used throughout this report is presented as Appendix A.

2. Physical Setting

2.1. Listed Water Bodies

Beaverdam Creek is located in Bedford County in the Roanoke River Basin (USGS Hydrologic Unit Code 03010101). The waterbody identification code (WBID, Virginia Hydrologic Unit) for Beaverdam Creek is VAW-L07R. The impaired segment is 5.58 miles in length. The impairment begins one half mile above Rt. 24 and ends 5.58 miles downstream at the impounded waters of Beaverdam Creek on Smith Mountain Lake. The Beaverdam Creek watershed is outlined below.

Figure 1. Map of the Beaverdam Creek study area

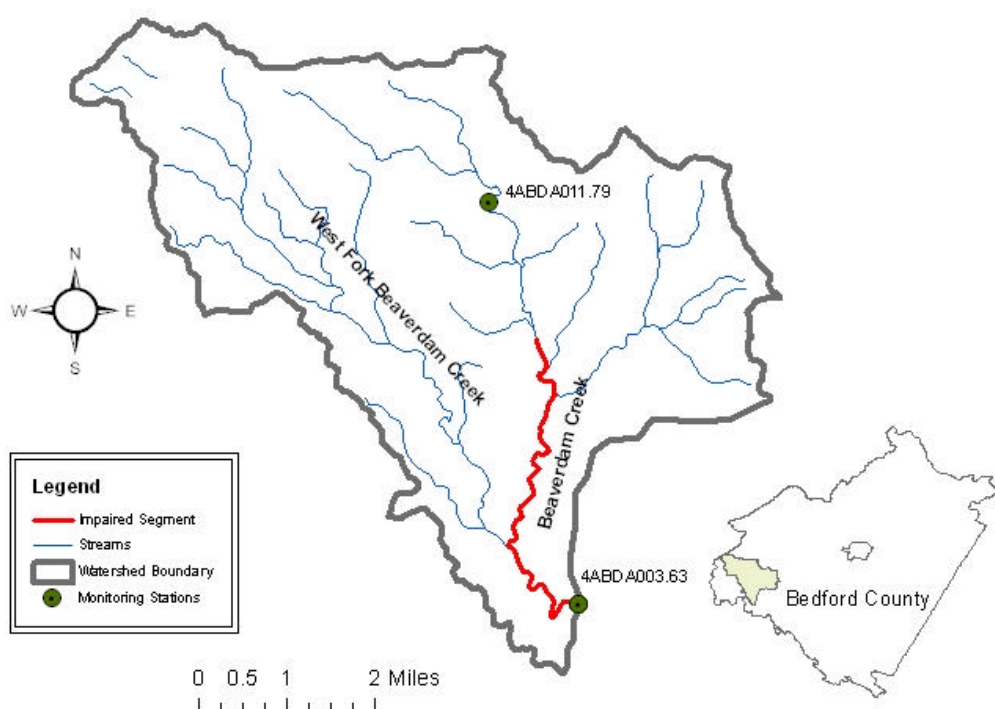


Table 1. Impaired segment description (Beaverdam Creek)

Segment (segment ID)	Impairment (source of impairment)	Upstream Limit Description	Downstream Limit Description	Miles Affected
Beaverdam Creek (VAW-L07R)	Fecal Colliform (NPS – Agriculture/Wildlife)	One half mile above Rt. 24 on Beaverdam Creek	Impounded waters of Beaverdam Creek	5.58

2.2. Watershed

2.2.1. General Description

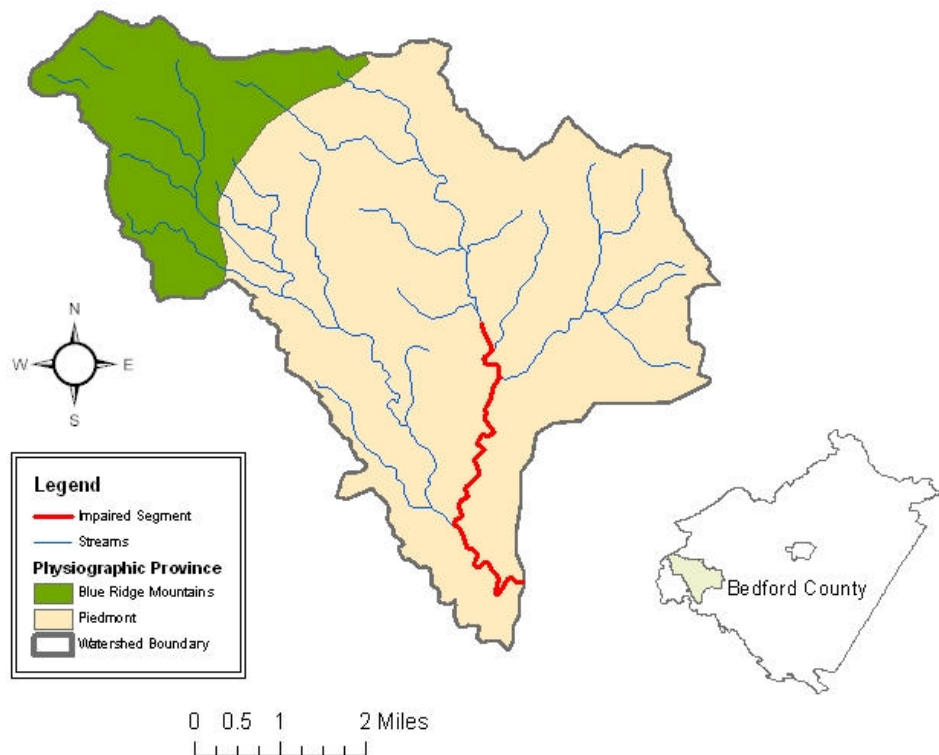
The Beaverdam Creek watershed is located entirely within Bedford County, Virginia. Beaverdam Creek watershed runs southeast towards the Roanoke River in the backwaters of Smith Mountain Lake. The watershed is approximately 8.3 miles long and 3.7 miles wide having an area of approximately 27.2 square miles.

Beaverdam Creek flows south from its headwaters, then turns southwest where Rt. 24 crosses it between Stewartsville and Chamblissburg, then becomes a minor tributary to the Roanoke River in the backwaters of Smith Mountain Lake at the Bedford County/Franklin County line, Virginia. Eventually, the Roanoke River discharges into the Albemarle Sound.

2.2.2. Geology, Climate, Land Use

Geology and Soils

Figure 2. Major physiographic provinces within the Beaverdam Creek watershed



Beaverdam Creek is located in Bedford County within the Blue Ridge and Piedmont physiographic provinces (Figure 2). Topography varies sharply in the watershed, with elevations above sea level ranging from 240 (787 ft) to 793 (2601 ft) meters (Figure 3). Major soil groups in the region are shown in Figure 4 using the State Soil Geographic (STATSGO) Data Base (STATSGO, 1994). In general, soils with high infiltration rates and low runoff potential are located in the valley while soils with low infiltration rates and high runoff potential tend to be found along the ridges. The valley soils also tend to be better suited for development, septic systems and agriculture than the ridges.

Figure 3. Elevation profile of the Beaverdam Creek watershed

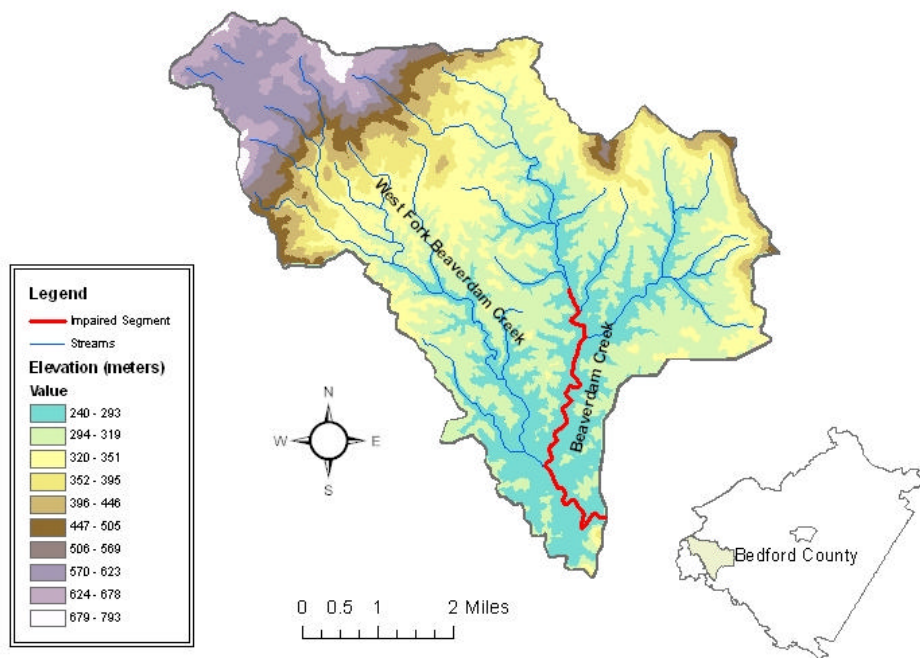
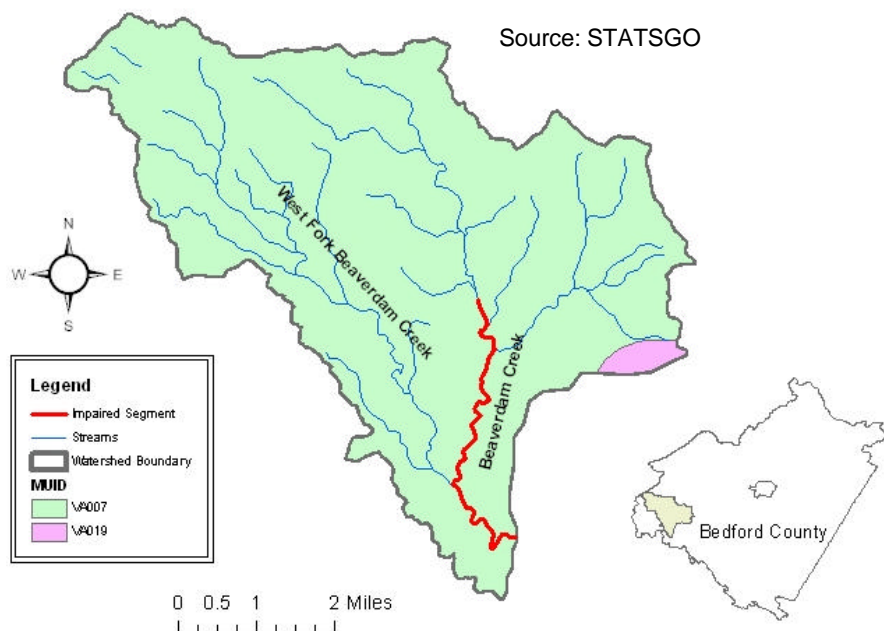


Figure 4. Major soil groups of the Beaverdam Creek watershed



Climate

The drainage area of the Beaverdam Creek watershed is approximately 27.2 square miles. The average annual rainfall as recorded at Bedford, Virginia (~12 miles northeast of study area) is 41.87 inches. Table 2 presented below provides a summary of climate data for the Bedford, Virginia weather station (Hydrodata 2001).

Table 2. Climate summary for Bedford, Virginia (440551)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Average Max. Temperature (°F)	47.9	45.55	52.31	63.05	70.37	75.93	79.29	78.3	73.22	63.4	55.03	49.08	58.63
Average Min. Temperature (°F)	24.27	30.55	36	52.24	59.13	67.17	71.3	69.53	61.95	48	41.27	28.05	52.56
Average Total Precipitation (inches)	2.34	1.21	3.70	3.34	4.56	5.73	4.23	3.92	4.38	2.59	2.80	3.07	41.87

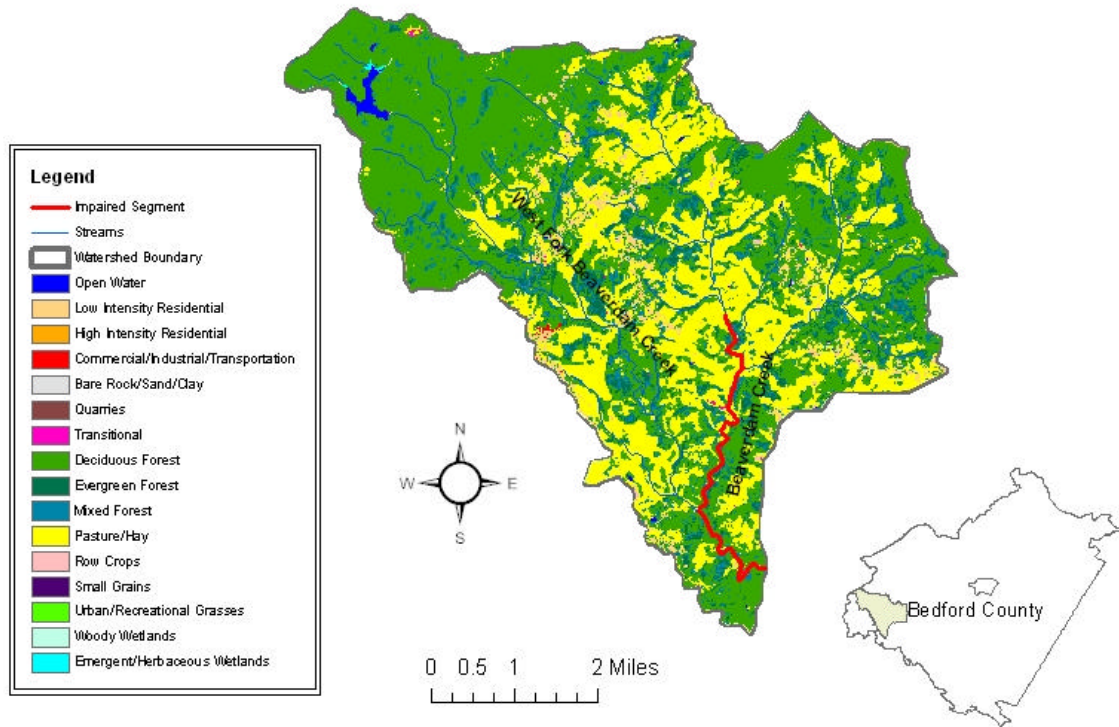
Land Use

The Beaverdam Creek watershed study area is approximately 17,427 acres, which is predominately forested (67 percent), with the majority of the remaining area in pasture land (29 percent). The remaining four percent of the watershed consists of residential areas, crop land, wetlands, and open water (Table 3). A map of the distribution of land use in the watershed (Figure 5) indicates that the pasture land tends to be located closer to the stream, while the forest land is farther from the stream. This is most likely due to the hilly topography of the watershed and the need for livestock watering access. The steeper slopes at the edges of the watershed have remained forested while the shallower slopes near the stream are used for agriculture.

Table 3. Land use in the Beaverdam Creek watershed

Land Use Category	Area (acres)	Area (%)
Open Water	86.7	0.50
Low Intensity Residential	464.4	2.66
High Intensity Residential	0	0.00
High Intensity Commercial/Industrial	11.1	0.06
Transitional	18.2	0.10
Deciduous Forest	9146.9	52.49
Evergreen Forest	1073.5	6.16
Mixed Forest	1474.7	8.46
Pasture/Hay	5063.5	29.05
Row Crops	76.3	0.44
Woody Wetlands	3.6	0.02
Emergent Herbaceous Wetlands	8.5	0.05
Total	17427.3	100.00

Source: Virginia National Land Cover Data (NLCD) Version 05-27-99

Figure 5. Land Use in the Beaverdam Creek Watershed

3. Description of Water Quality Problem/Impairment

Beaverdam Creek was listed as a 1998 Attachment B station on the 1999 Federal Consent Decree and listed as impaired on Virginia's 1998, 2002, and 2004 303(d) Total Maximum Daily Load Priority List and Report on Impaired Waters (DEQ, 1998, 2002, & 2004) due to violations of the Commonwealth's water quality standard for fecal coliform bacteria. Out of 23 samples collected during the 2002 assessment period, 3 samples exceeded the water quality standard for fecal coliform at station 4ABDA003.63. The complete sampling record for station 4ABDA003.63 is highlighted in Tables 4 and 5. Time series fecal coliform data and seasonal fecal coliform data is found in figures 7 and 8, respectively.

Tables 4 and 5 present a summary of all of the fecal coliform and *E. Coli* data collected by DEQ on Beaverdam Creek, respectively. The listing station for the water quality impairment is 4ABDA003.63, which is depicted in the watershed map below (Figure 6).

Table 4. Fecal coliform data collected by DEQ on Beaverdam Creek

Station	Date of First Sample	Date of Last Sample	Number of Samples	Average (cfu/100 ml)	Minimum (cfu/100 ml)	Maximum (cfu/100 ml)	Number of Exceedances*
4ABDA003.63	1/18/2001	1/5/2006	31	616	20	3000	5
4ABDA011.79	10/23/2001	10/23/2001	1	100	100	100	0
1998 305(b) Data (July 1, 1992 to June 30, 1997)							
4ABDA003.63	8/20/1992	6/5/1997	16	825	100	3700	3
2002 305(b) Data (January 1, 1996 to December 31, 2000)							
4ABDA003.63	6/5/1996	11/9/2000	22	732	100	8000	3

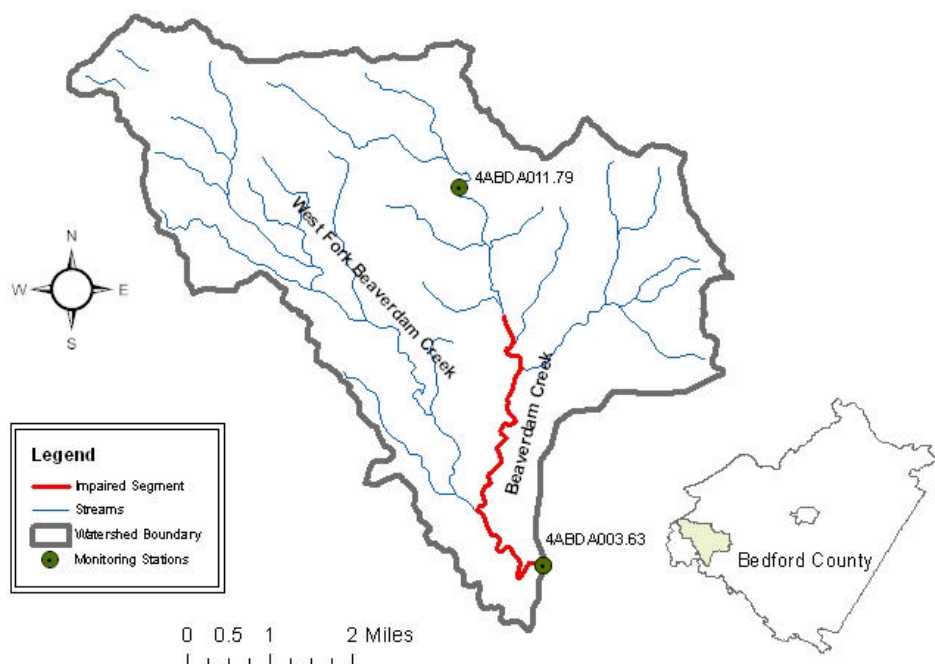
* Exceedances of the then-applicable instantaneous standard of 1,000 cfu/100 mL

Table 5. *E. Coli* data collected by DEQ on Beaverdam Creek

Station	Date of First Sample	Date of Last Sample	Number of Samples	Average (cfu/100 ml)	Minimum (cfu/100 ml)	Maximum (cfu/100 ml)	Number of Exceedances*
4ABDA003.63	7/10/2003	1/5/2006	28	420	16	1800	17

* Exceedances of the *E. Coli* instantaneous standard of 235 cfu/100 mL

Figure 6. Map of Beaverdam Creek watershed



A time series graph of the data collected at station 4ABDA003.63 from 1988 until 2004 is presented as Figure 7. The upper horizontal line at the 1000 cfu/100 ml mark represents the then-applicable

instantaneous fecal coliform water quality standard. The lower horizontal line represents the interim instantaneous fecal coliform water quality standard. The data points above the 1000 cfu/100 ml line illustrate violations of the water quality standard.

Figure 7. Time series of fecal coliform concentrations (station 4ABDA003.63)

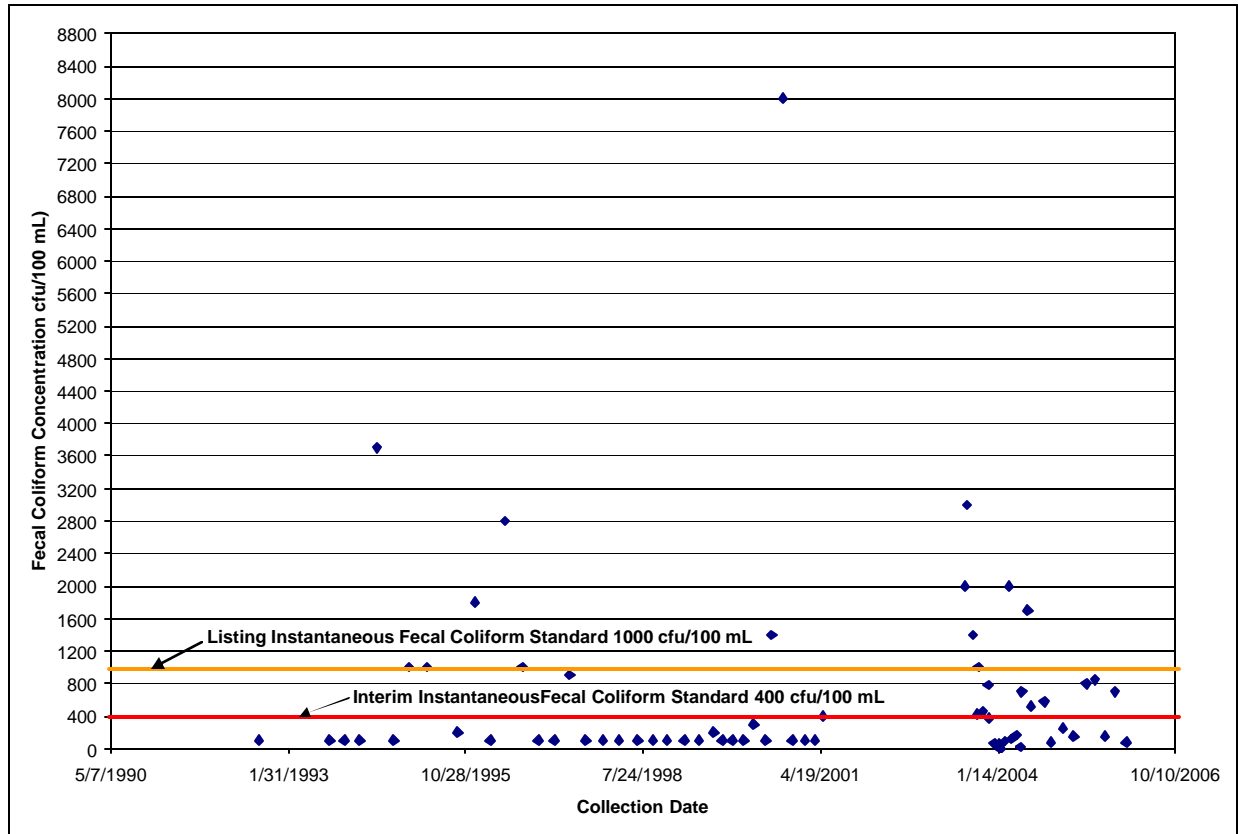
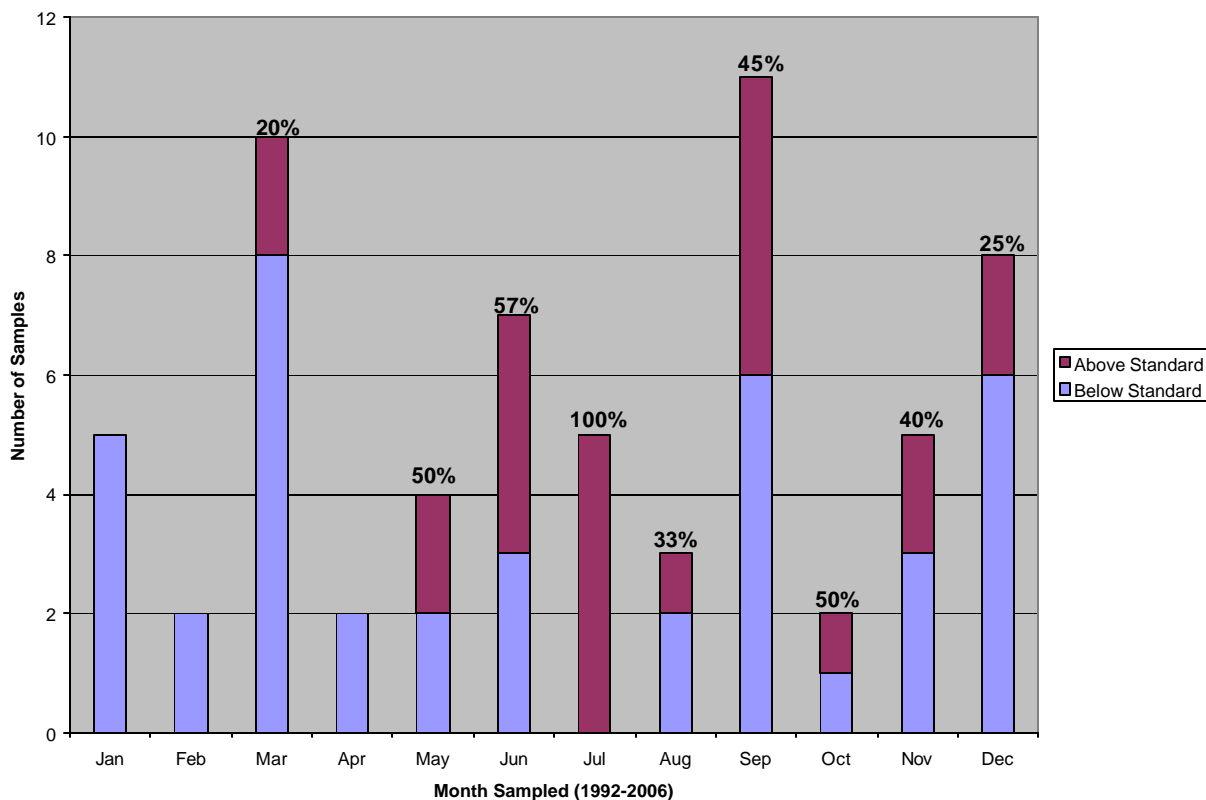


Figure 8 presents the distribution of water samples and exceedances (instantaneous fecal water quality standard - 1000 cfu/100mL) by month.

Figure 8. Distribution of fecal coliform samples and violations (station 4ABDA003.63)



4. Water Quality Standard

According to Virginia Water Quality Standards (9 VAC 25-260-5), the term “water quality standards means provisions of state or federal law which consist of a designated use or uses for the waters of the Commonwealth and water quality criteria for such waters based upon such uses. Water quality standards are to protect the public health or welfare, enhance the quality of water and serve the purposes of the State Water Control Law (§62.1-44.2 et seq. of the Code of Virginia) and the federal Clean Water Act (33 USC §1251 et seq.).”

As stated above, Virginia water quality standards consist of a designated use or uses and water quality criteria. These two parts of the applicable water quality standard are presented in the sections that follow.

4.1. Designated Uses

According to Virginia Water Quality Standards (9 VAC 25-260-10A), “all state waters are designated for the following uses: recreational uses (e.g., swimming and boating); the propagation and growth of a balanced indigenous population of aquatic life, including game fish, which might be reasonably expected to inhabit them; wildlife; and the production of edible and marketable natural resources (e.g., fish and shellfish).”

As stated above, Beaverdam Creek must support all designated uses and meet all applicable criteria.

4.2. Applicable Water Quality Criteria

The applicable water quality criteria for bacteria in the Beaverdam Creek watershed changed since the initial listing on the 303(d) report. Following EPA recommendations, the DEQ proposed more stringent fecal coliform bacteria standards as well as new standards for *Escherichia coli* (*E. coli*) bacteria. These new standards were adopted by the State Water Control Board in May 2002, public noticed in June 2002, approved by the USEPA in November 2002, and were effective January 15, 2003.

The EPA recommendation that states adopt *E. coli* and enterococci (saltwater) standards stems from a stronger correlation between the concentration of *E. coli* and enterococci organisms and the incidence of gastrointestinal illness. *E. coli* and enterococci are both bacteriological organisms that can be found in the intestinal tract of warm-blooded animals. *E. coli* is a subset of fecal coliform group; thus a waterbody listed as impaired for fecal coliform is considered to be listed for *E. coli* as well.

Although Beaverdam Creek was listed as impaired due to a violation of the previous fecal coliform standard, the TMDL must be developed to meet the new *E. coli* bacteria standard. The interim fecal coliform bacteria standard presented below will not apply to this TMDL since 12 *E. coli* bacteria samples were collected as part of the bacteria source tracking study of the source assessment.

New Bacteria Standards

For a non-shellfish supporting water body such as Beaverdam Creek to be in compliance with Virginia bacteria standards for primary contact recreational use, the DEQ specifies the following criteria (9 VAC 25-260-170):

1. *Fecal coliform bacteria shall not exceed a geometric mean of 200 fecal coliform bacteria per 100 ml of water for two or more samples over a calendar month nor shall more than 10% of the total samples taken during any calendar month exceed 400 fecal coliform bacteria per 100 ml of water. This criterion shall not apply for a sampling station after the bacterial indicators described in subdivision 2 of this subsection have a minimum of 12 data points or after June 30, 2008, whichever comes first.*

2. *E.coli and enterococci bacteria per 100 ml of water shall not exceed the following:*

Table 6. Applicable water quality standards

Parameter	Geometric Mean ¹ (cfu/100 ml)	Single Sample (cfu/100 ml)
<i>E.coli</i> (fresh water)	126	235
Enterococci (saltwater & Transition Zone 3)	35	104

¹ for two or more samples taken during a calendar month.

If the waterbody exceeded either criterion more than 10.5% of the time, the waterbody was classified as impaired and the development and implementation of a TMDL was indicated in order to bring the waterbody into compliance with the water quality criterion. Based on the sampling frequency, only one criterion was applied to a particular datum or data set (9 VAC 25-260-170). If the sampling frequency was one sample or less per 30 days, the instantaneous criterion was applied; for a higher sampling frequency, the geometric criterion was applied. These were the criteria used for listing the impairments included in this study. Sufficient fecal coliform bacteria standard violations were recorded at DEQ water quality monitoring stations to indicate that the recreational use designations are not being supported.

For Beaverdam Creek, the TMDL is required to meet the instantaneous criterion since the load-duration approach used to develop the TMDL for Beaverdam Creek yields the maximum allowable bacteria

concentration under any given flow condition. Unlike a continuous time series simulation, the flow duration approach does not yield daily bacteria concentrations which are needed to apply the geometric mean standard. Such an approach ensures that TMDLs, when implemented, do not result in violations under a wide variety of scenarios that affect bacteria loading.

5. Assessment of Bacteria Sources

The assessment bacteria sources in traditional bacteria TMDL studies involves estimating loads from sources in the watershed and developing a computer model to establish the links between estimated loads and actual in-stream bacteria concentrations.

In a load-duration bacteria TMDL, source assessment is accomplished by determining the relative contribution by source of the fecal bacteria contained in a sample of stream water. This method of source identification is achieved through microbial source tracking (MST). MST methods that specifically use bacteria as the target organism are referred to collectively as bacteria source tracking (BST) methods. MST has been applied to study microbial ecology of environmental systems for years and are now being applied to help improve water quality by identifying problem sources and determining the effect of implemented remedial solutions. Management and remediation of water pollution would be more cost effective if the correct sources could be identified (Simpson, 2002).

To support BST analyses in load-duration TMDLs, bacteria loading in a watershed are also estimated. These load estimates are broken into point and non-point sources. It is important to note that the non-point source load estimates represent loading to the surface of the watershed; they are not estimates of in-stream loads.

The following sections present BST analysis and point- and non-point source load estimates.

5.1. Bacteria Source Tracking (BST)

Background

MST methods can be divided into three categories: molecular (genotype), biochemical (phenotype), and chemical. Molecular methods may offer the most precise identification of specific types of sources but are limited by high per-isolate costs and detailed and time-consuming procedures. They are not yet suitable for assaying large numbers of samples in a reasonable time frame. Biochemical methods (BST) may or may not be as precise, but are simpler, quicker, less costly, and allow large numbers of samples to be assayed in a short period of time (Hagedorn, 2002).

Several biochemical BST methods are in various stages of development. Among these are Antibiotic Resistance Analysis (ARA), F-Specific (F+ or FRNA) Coliphage, Sterols or Fatty Acid Analysis, Nutritional Patterns, and Fecal Bacteria Ratios. Of these, ARA has been chosen as the BST method for this TMDL report.

The ARA method uses fecal streptococcus (including the enterococci) and/or *E. coli* and patterns of antibiotic resistance for separation of sources. The premise is that human fecal bacteria will have the greatest resistance to antibiotics and that domestic and wildlife animal fecal bacteria will have significantly less resistance (but still different) to the battery of antibiotics and concentrations used. Most investigators are testing each isolate on 30 to 70+ antibiotic concentrations (Hagedorn, 2002). A more detailed description of the ARA method used by MapTech, Inc. in support of this TMDL is presented in Appendix B.

BST Sampling and Results

A total of 12 ambient water quality samples were collected by DEQ staff and submitted to MapTech, Inc. (MapTech) for BST analysis. The BST analyses performed by MapTech determined the relative contribution of overall bacteria by human, pet, livestock, and wildlife sources. *E. coli* bacteria were also enumerated as part of the analyses performed by MapTech. Results of the Beaverdam Creek BST sampling program are presented in Table 6.

Table 7. Beaverdam Creek (4ABDA003.63) Bacteria Source Tracking results

Sample Date	<i>E. coli</i> (cfu)	BST Distribution			
		Human	Pet	Livestock	Wildlife
7/20/2004	1800	8%	26%	33%	33%
8/31/2004	410	0%	54%	21%	25%
9/22/2004	720	0%	4%	42%	54%
10/25/2004	500	21%	4%	21%	54%
11/23/2004	410	0%	21%	12%	67%
12/27/2004	16	0%	12%	42%	46%
1/31/2005	26	33%	47%	7%	13%
2/16/2005	130	96%	0%	4%	0%
3/29/2005	84	4%	84%	12%	0%
4/27/2005	560	55%	12%	4%	29%
5/24/2005	160	38%	12%	25%	25%
6/28/2005	800	0%	67%	29%	4%
Average		21%	29%	21%	29%
Median		6%	17%	21%	27%
Weighted Average ¹		15%	15% 21% 27%	22%	37%

¹ Weighted average is the average of the number of isolates times the concentration times flow times percentage.

The BST data results indicate that the majority bacteria are coming from anthropogenic sources. Approximately 63% of the bacteria found in the Beaverdam Creek study comes from human, pet, or livestock sources.

5.2. Point Sources

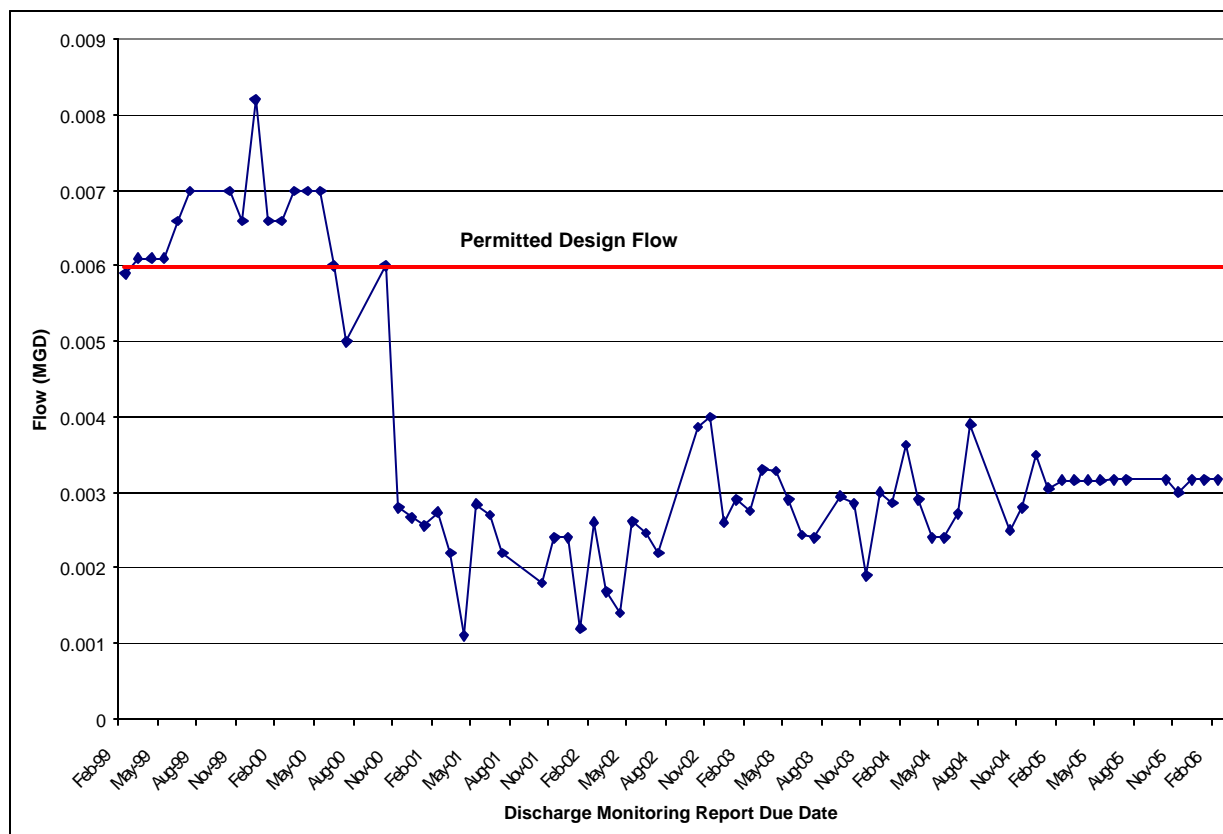
Bacteria loading from point sources such as sewage treatment plants, small commercial establishments, schools, homes and businesses require permits under the Virginia Pollution Discharge Elimination System (VPDES) permit program. In order to consider all such point-source discharges in the Beaverdam Creek watershed, the DEQ comprehensive environmental database and regional DEQ permit staff were queried. Three bacteria point source discharges were identified in Goodview, Virginia.

One of the point source discharges is covered under VPDES individual permits for sewage discharge for having greater than 1000 gallons per day. The other two point source discharges are VPDES General Permit holders with discharges of less than 1000 gallons per day. The permitted point sources are presented in Table 8.

Table 8. VPDES point source facilities and loads

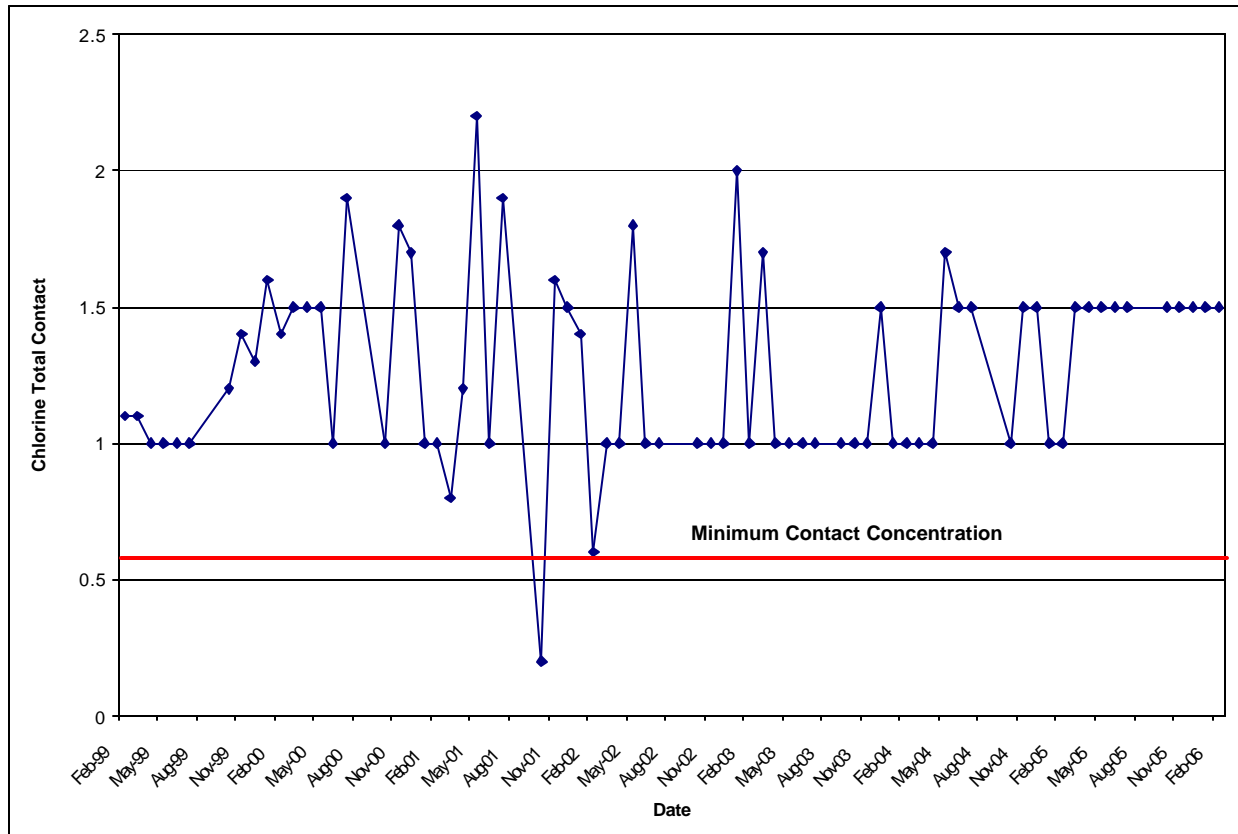
VPDES Permit Number	Facility Name	Receiving Stream	Watershed ID	Design Flow (MGD)	Effluent Limit (cfu/100 ml)	Wasteload Allocation
VA0020842	Bedford Co. Schools - Stewartsville Elementary	Nat Branch UT	VAW-L07R	.006	126	1.04×10^{10}
VAG402101	Behrens Residence	Nat Branch UT	VAW-L07R	.001	126	1.74×10^9
VAG402030	Jordantown Wesleyan Church	Beaverdam Creek	VAW-L07R	.001	126	1.74×10^9
Existing WLA					N/A	1.39×10^{10}
Expansion Matrix						
					Total x 2	2.78×10^{10}
					Total x 5	6.95×10^{10}

Permitted loads were calculated by multiplying the permitted discharge concentration (126 cfu/100 ml) times the design flow (.006 MGD or 6,000 gal/day) times the appropriate unit conversions. The calculation is presented in Appendix C. The expansion matrix allows the TMDL to account for future expansions and/or the addition of new discharges (see Appendix F).

Figure 9. Stewartsville Elementary School STP Average Daily Flow

The Stewartville Elementary Sewage Treatment Plant (STP) is permitted to discharge an average of 6,000 gallons per day (gpd) or 0.006 million gallons per day (MGD). Figure 9 shows the variation of the Stewartville Elementary School STP flow from February 1999 until February 2006. The average daily flow ranged from 1,100 to 8,200 gpd (0.0011 to 0.0082 MGD). Recent flows are within DEQ permitted levels however, several high flow observations were reported prior to 2001.

Figure 10. Stewartville Elementary School STP Chlorine Total Contact Concentration



The Stewartville Elementary School STP uses chlorine to disinfect wastewater. Reported chlorine total contact concentrations are presented in Figure 10. Chlorine concentration data from February 1999 until February 2006 indicate that total contact chlorine concentrations ranged from 0.6 to 1.5 mg/L, except for one point that was 0.2 mg/L in 2001. This indicates that adequate disinfection was achieved at the plant 99% of the time.

5.3. Non-Point Sources

In order to gain an understanding of non-point source loading in the Beaverdam Creek watershed, bacteria loads for typical non-point sources were estimated. These estimates were based upon animal and human population data sets, typical waste production rates and typical bacteria densities in waste products.

Currently published values for fecal bacteria production rates are primarily in terms of fecal coliform. There is little data on *E. coli* production; however, studies have shown that though minor variability will exist between sources, *E. coli* represents roughly 90-95% of fecal coliforms contained in "as-excreted" fecal material (Yagow, 2002). This implies that the relative bacteria contribution by source should remain constant.

It is important to note that the bacteria loads presented in the following sections on non-point sources represent "as-produced" loads. This is to say that some portion of an estimated load may not be available to be transported to Beaverdam Creek in runoff.

5.3.1. Humans and Pets

Bacteria loading from human sources can come from straight pipes, failing septic systems, and land-applied biosolids. Failing septic systems are typically manifested by effluent discharging to the ground surface where the bacteria laden effluent is then available to be washed into a stream as runoff during a precipitation event. In contrast, discharges from straight pipes are typically directly deposited in streams.

All biosolids can contain a certain concentration of fecal bacteria. When biosolids are applied to the land surface, the potential exists for a portion of these fecal bacteria to be transported to a stream as runoff during storm events.

Straight Pipes

The Bedford County Health Department office of the VDH reported possible straight pipes in the Beaverdam Creek Watershed.

Septic Systems

Based on 2000 U.S. Census data, the Beaverdam Creek watershed is populated by approximately 3309 residents living in approximately 4183 households. It is assumed that all households are served by septic systems.

Based on the estimated population and number of households, there are an average of 1.26 people per household in the Beaverdam Creek watershed. It is assumed that all households use septic systems. Assuming a wastewater production rate of 75 gallons per day per person (Geldreich, 1978), and a fecal coliform density in septic tank waste of 1.04×10^6 cfu per 100 mL (MapTech, 2002), the total septic load in the Beaverdam Creek watershed is estimated to be 5.88×10^{14} cfu per year. Of this total septic load, only the load from failing septic systems would be available as runoff. Septic systems failure rates depend largely on the age of the septic system. Based on previous TMDL studies, it is estimated that septic systems in a watershed fail at rate between 5% and 15%.

Biosolids

In the Commonwealth of Virginia, the VDH and the DEQ regulate biosolids generation and application to the land surface. The DEQ regulates the generation of biosolids and the land application of those biosolids by the generator. The VDH regulates contractors who transport and spread biosolids; the biosolids can be from in-state or out-of-state sources.

DEQ acquired 2003-2004 biosolids data from the VDH central office located in Richmond, Virginia. Locations of permitted biosolid land application sites were mapped using Arc9 Geographic Information System software. No land applied biosolids were shown to be located in the Beaverdam Creek watershed.

Pets

The number of pets in the watershed was estimated based on the number of households. Assuming an average of 1.7 dogs and 2.1 cats per household (National Pet Owner Survey, American Pet Products Manufacturers Association, 2001-2002), the estimated pet population in the Beaverdam Creek watershed consists of 7111 dogs and 8784 cats. Using the waste production rates and fecal coliform densities from MapTech, 2002, the total bacteria loads from dogs and cats in the Beaverdam Creek watershed are 5.61×10^{14} and 5.60×10^8 cfu per year, respectively. Table 9 presents the calculation of human and pet loads

in the watershed. It should be noted that the numbers presented in Table 9 represent loads available for runoff and not in-stream loads.

Table 9. Estimated fecal coliform production from humans and pets in the Beaverdam Creek watershed

Source	Population	Waste Production Rate	Waste Fecal Coliform Density	Total Est. Annual Fecal Production
Failing Septic Systems	10% x 4183 systems x 1.3 people/system = 543.79 people	75 gal/day/person x 37.85412 100mL/gal x 365 days/yr = 1.04×10^6 100mL/yr/person *	1.04×10^6 cfu/100mL *	5.88×10^{14} cfu/yr
Dogs	7111 dogs	450 g/dog **	4.8×10^5 cfu/g **	5.61×10^{14} cfu/yr
Cats	8784 cats	19.4 g/cat **	9 cfu/g **	5.60×10^8 cfu/yr

* Geldreich, 1978. A conversion factor of 37.85412 was used to convert gallons to 100mL.

** MapTech, 2002 (Gills Creek TMDL Report).

5.3.2. Livestock

Fecal matter from livestock can be deposited directly to the stream in instances where livestock have stream access, or the fecal matter can be transported to the stream in surface runoff from grazing or pasture lands.

The predominant type of livestock in the Beaverdam Creek watershed are cattle, although many types of livestock were considered in developing the TMDL. Bedford County Census of Agriculture data for 2002 were used to estimate the livestock population in the watershed (<http://agcensus.mannlib.cornell.edu/show2.php>). The Beaverdam Creek watershed is located entirely within Bedford County and contains approximately 3.8% of the total pasture land in the county as determined by GIS analysis. Table 10 presents the livestock population estimates, fecal production rates, and estimated annual fecal loads in the watershed. It should be noted that the numbers presented in Table 10 represent loads available for runoff and not in-stream loads.

Table 10. Estimated annual fecal coliform production from livestock in the Beaverdam Creek watershed

Source	Population*		Waste Production Rate** (lbs/animal/day)	Fecal Density** (cfu/g)	Total Fecal Production*** (cfu/yr)
	Bedford County	Beaverdam Creek			
Beef Cows	23,500	893	46.4	1.01×10^5	6.93×10^{14}
Milk Cows	1,838	70	120.4	2.58×10^5	3.60×10^{14}
Sheep	343	13	2.4	4.30×10^4	2.22×10^{11}
Horses	1305	50	51.0	9.40×10^4	3.97×10^{13}

* The livestock population in the Beaverdam Creek watershed was estimated as 3.8% of the County livestock population.

** MapTech, 2002.

*** A conversion factor of 453.6 was used to convert pounds to grams.

5.3.3. Wildlife

Like livestock, fecal matter from wildlife can be either deposited directly to the stream, or it can be transported to the stream in surface runoff from woods, pastureland and cropland. Direct deposition to streams varies with species, e.g. beaver spend most of their time in water; therefore most of their fecal matter would be directly deposited to the stream.

Wildlife populations in the Beaverdam Creek watershed were estimated based on wildlife densities used in developing the Reed Creek TMDL. Use of the Reed Creek TMDL wildlife densities was deemed appropriate by the Department of Game and Inland Fisheries (Norman, 1999). Habitat was assigned as follows:

- deer: all land use categories
- turkey: deciduous forest, evergreen forest, mixed forest
- muskrat: woody wetlands, emergent herbaceous wetlands, open water
- beaver: stream miles
- raccoon: low intensity residential, deciduous forest, evergreen forest, mixed forest, woody wetlands, row crops
- goose: pasture/hay, row crops, emergent herbaceous wetlands, open water
- mallard: woody wetlands, emergent herbaceous wetlands, open water

Table 11. Estimated fecal coliform production from wildlife in the Beaverdam Creek watershed

Source	Population Density ¹	Habitat	Watershed Population (animals)	Range or Waste Production Rate (cfu/animal/day)		Range or Fecal Coliform Production (cfu/yr)	
				Low	High	Low	High
Deer	0.084 an/ac	17,427.3 ac	1464	1.52×10^8	3.60×10^8	8.12×10^{13}	1.92×10^{14}
Turkey	0.010 an/ac	11,695.1 ac	117	9.3×10^7		3.97×10^{12}	
Muskrat	2.751 an/ac	98.8 ac	272	2.50×10^7	1.90×10^8	2.48×10^{12}	1.89×10^{13}
Beaver	4.800 an/mi	49 mi	235	3.00×10^6		7.05×10^8	
Raccoon	0.070 an/ac	12,239.4 ac	857	2.05×10^7	9.45×10^8	6.41×10^{12}	2.96×10^{14}
Goose	0.004 an/ac	5,235 ac	21	5.87×10^4	2.25×10^9	4.50×10^8	1.72×10^{13}
Mallard	0.002 an/ac	98.8 ac	0	2.43×10^9		0	
Total						9.40×10^{13}	5.28×10^{14}

¹Virginia Department of Conservation and Recreation, 2000

6. TMDL Development

One of the major obstacles to improving stream water quality is that the potential sources of bacteria are numerous and the dominant sources and/or pathways are generally unknown. This can make it difficult to direct effective cleanup efforts.

Typical pathogen TMDLs are completed by developing watershed-based computer simulations that establish links between sources and in-stream water quality. While effective, the effort required to develop modeled TMDLs can be costly. In an effort to complete pathogen TMDLs in a timely and cost-effective manner, the use of load-duration analyses has been evaluated. It has been determined that the load-duration method of calculating a TMDL produces a result only slightly more conservative than if the TMDL had been determined through computer modeling.

The load duration method essentially uses an entire stream flow record to provide insight into the flow conditions under which exceedances of the water quality standard occur. Exceedances that occur under low flow conditions are generally attributed to loads delivered directly to the stream such as straight pipes and livestock with access to the stream. Exceedances that occur under high flow conditions are typically attributed to loads that are delivered to the stream in stormwater runoff. Exceedances occurring under during normal flows can be attributed to a combination of runoff and direct deposits.

The following sections detail the development of the load-duration TMDL and associated allocations.

6.1. *Load-Duration Curve*

Development of a load-duration curve begins with a flow-duration curve, and in order to develop a meaningful flow-duration curve one must have several years of flow data for the target stream or river. Where very little flow data exists for a target stream, a reference stream with the requisite flow measurements must be used similar to the paired watershed approach used in watershed-based modeling. Such is the case for Beaverdam Creek.

The following sections detail the flow data for Beaverdam Creek, the selection of a reference stream, development of a flow-duration curve for Beaverdam Creek, and the creation of a load-duration curve for Beaverdam Creek.

6.1.1. Flow Data

Beaverdam Creek is located in the eastern part of Bedford County and has a drainage area of 27.2 square miles. It is a tributary to the Roanoke River with its confluence in the backwaters of Smith Mountain Lake near the Bedford County/Franklin County line, Virginia.

Beaverdam Creek does not have a continuous stream flow gaging station, so continuous flow measurements were not available. However, DEQ has a special study flow station co-located with the listing station at the Rt. 757 bridge (4ABDA003.63). The data consists of 18 data points collected from 1981-1984 and 2004-2005. DEQ's special study flow data is used to select an appropriate reference watershed using a basin size ratio. This process is detailed in Section 6.1.2 and Appendix D.

6.1.2. Reference Stream

In order to develop a flow-duration curve for Beaverdam Creek, it was necessary to select a reference stream with a gage having a period of record of no less than ten years.

In selecting a reference gauge several factors must be considered. Among these are proximity, watershed topography, watershed size, land use, ecoregion, elevation, and geology. The period of record for the reference gauge must also include dates that coincide with flow measurements made at the target stream - in this case Beaverdam Creek. The ultimate goal is to find a gaged stream that behaves like the target stream.

A basin size ratio is established by using the flow data from 4ABDA003.63 (VDEQ special study). Three potential reference gages were selected based on factors listed above. All three potential reference gages had high R-values (see Appendix D), but Kerrs Creek was selected as the reference stream based on proximity and similar land use. The Kerrs Creek gage is located in Rockbridge County near Lexington, Virginia and is in Hydrologic Unit Code 02080202. The dominant land use types in the Kerrs Creek watershed are forest and agriculture, similar to the Beaverdam Creek watershed.

Once Kerrs Creek was determined to represent the best reference gage, the basin size ratio was calculated. Kerrs Creek has a watershed size of 35 square miles at the stream gage and Beaverdam Creek is 27.2 square miles at Route 757. This ratio was used to create a continuous flow record for the Beaverdam Creek watershed.

6.1.3. Flow-Duration Curves

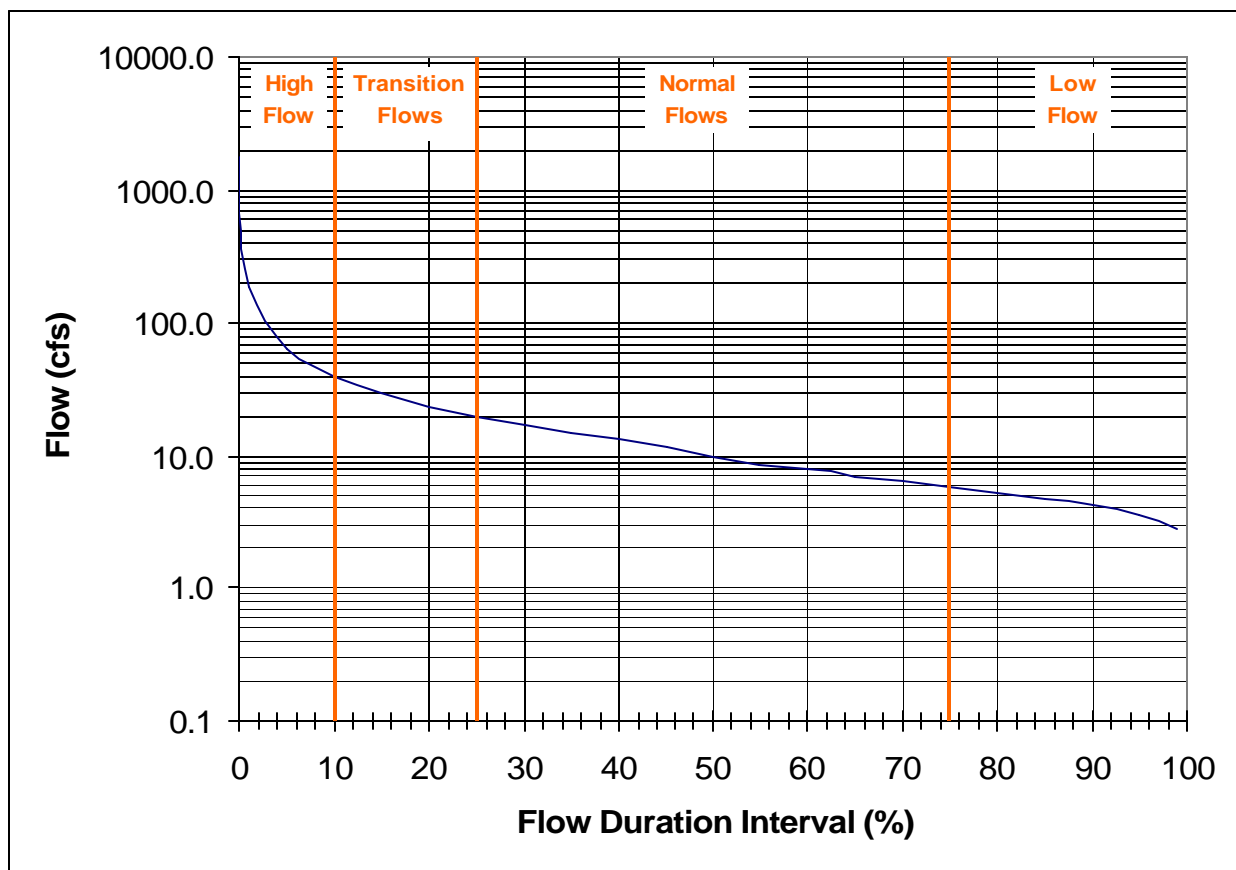
In order to use the load-duration method to develop a TMDL, a flow-duration curve must be developed for the impaired stream. This is accomplished by first developing a flow-duration curve for the reference stream.

A flow-duration curve is a plot showing the flow magnitude (cfs) along the "y" axis and the frequency of daily average stream flow (%) along the "x" axis. For example, the flow value corresponding to "1%" is the flow that has been exceeded only 1% of the time for which measurements exist. Likewise, the flow value corresponding to "30%" is the flow that 30% of the historic record exceeds.

To plot the flow values for the period of record of the reference stream, the PERCENTILE statistic function of Excel was used. The resulting percentile of a given flow was then subtracted from 1 to yield the percent of time that a given flow is exceeded by the flows of record. The flow duration interval values were plotted with the corresponding flows to yield a log/normal flow duration curve. The flow-duration curve for Beaverdam Creek is presented as Figure 11.

The flow-duration curve for Beaverdam Creek has been divided into four sections to help illustrate flow conditions. These sections are titled "High Flows", "Transition Flows", "Normal Flows", and "Low Flows". Low flows can be roughly equated to near-drought or drought flows. High flows are near-flood or flood flows. Transition flows are, as implied, neither normal nor high.

Figure 11. Flow-duration curve for Beaverdam Creek



6.1.4. Load-Duration Curve

As mentioned in Section 3, the violations of the bacteria water quality standards on Beaverdam Creek were collected at Station 4ABDA003.63.

A load-duration curve is developed by multiplying each flow level along the flow-duration curve by the applicable water quality standard and required unit conversions. The resulting curve represents the maximum allowable load at each flow level, in other words, the Total Maximum Daily Load (TMDL). Since the TMDL and required reductions must be in terms of an average annual stream flow, the loads on the load-duration curve are multiplied by 365 days/year and presented as annual loads.

In order to plot existing fecal coliform (FC) data against the *E. coli* (EC) standard/TMDL line, it was necessary to translate the FC data to EC data. Translation of FC data to EC data was achieved by using a translator equation developed from a regression analysis of 493 paired FC/EC data sets from the DEQ's statewide monitoring network. The translator equation resulting from the regression analysis is presented below:

$$\text{EC log}_2 = -0.0172 + 0.91905 * \text{FC log}_2$$

By plotting these observed loads on the load-duration curve, the number and pattern of exceedances of the water quality standard (TMDL) can be analyzed. The load duration curve and observed data for Beaverdam Creek are shown in Figure 12. The TMDL line has been plotted for the instantaneous *E. coli* standard of 235 cfu/100mL.

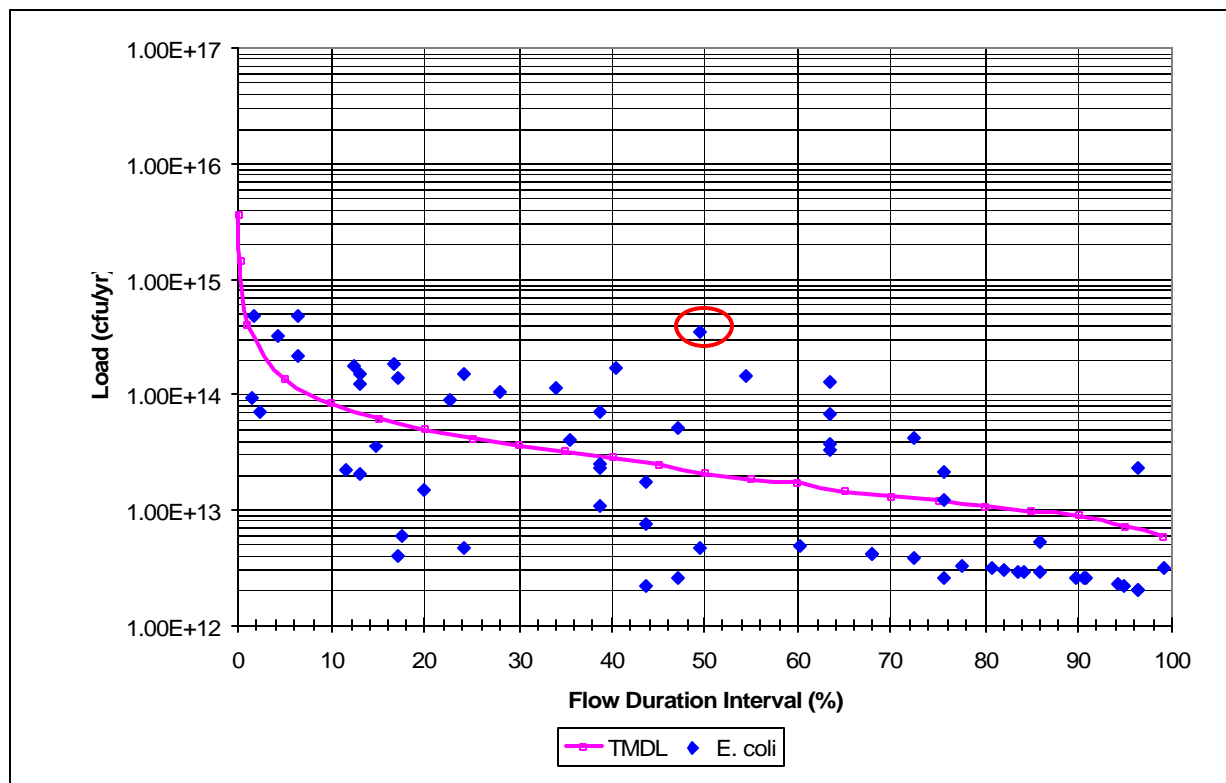
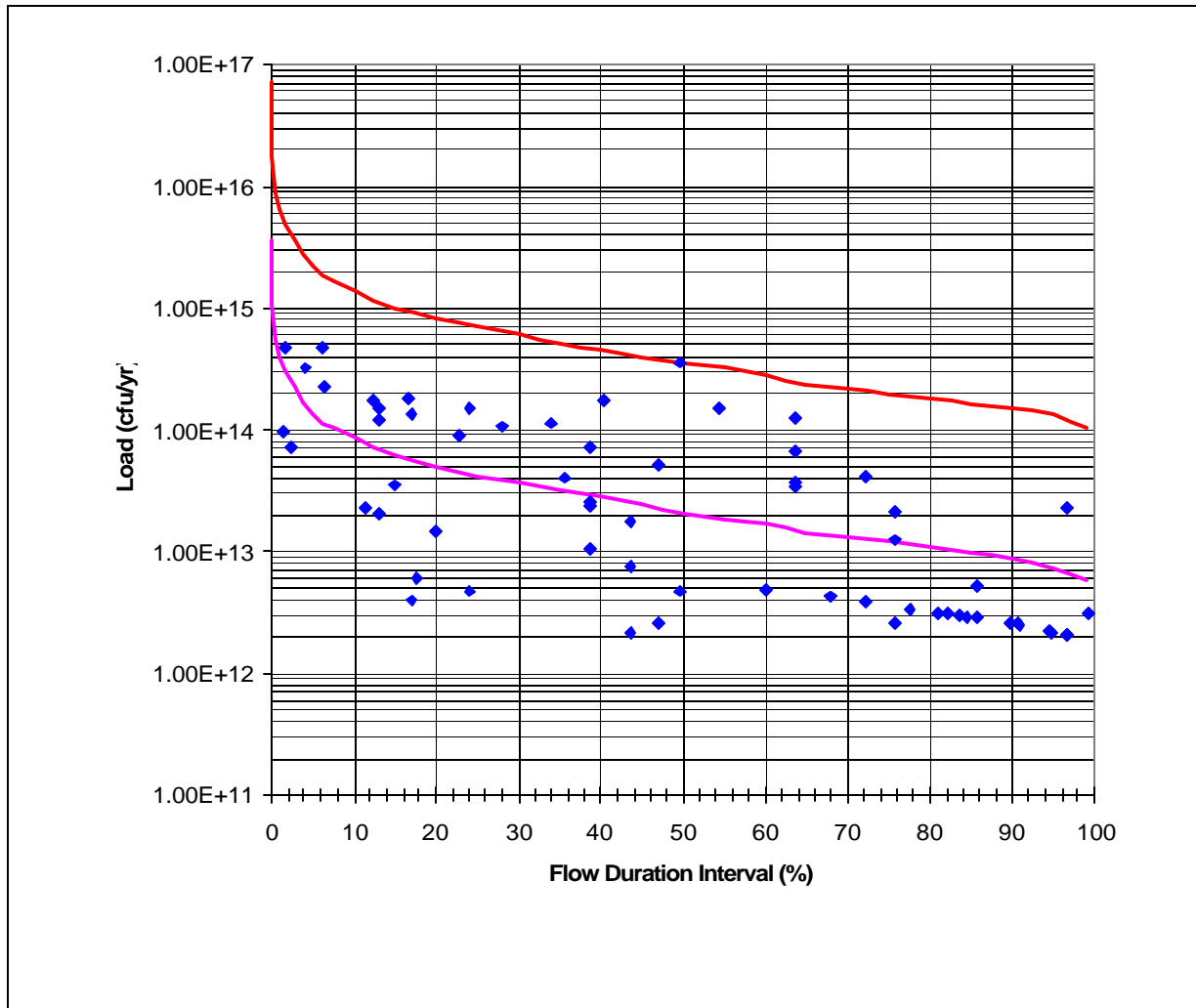
Figure 12. Load duration curve and observed data for Beaverdam Creek at station 4ABDA003.63

Figure 12 suggests that exceedances of the water quality standard occur under high, normal and low flow conditions. The highest exceedance of the water quality standard (circled) occurs at a normal flow that has been exceeded approximately 50% of the time (~10 cfs). This represents the flow condition under which the largest bacteria reduction is required in order to meet water quality standards. The translated load at this flow condition is 3.56×10^{14} cfu/yr. Under the instantaneous *E. coli* standard of 235 cfu/100mL, this load would have to be reduced by 94% to an allowable load of 2.19×10^{13} cfu/yr. The allowable load is simply the *E. coli* standard multiplied by the applicable flow condition and the proper unit conversions. The full calculation with unit conversions is presented in Appendix C.

In order to determine the necessary load reduction at the average annual flow condition, a second curve must be drawn through the highest exceedance described above. The second curve represents the magnitude of the highest observed exceedance if it were to occur over any flow condition. The graph of the load-duration curve with the max-exceedance curve is presented in Figure 13.

Figure 13. Load duration curve with max exceedance curve for Beaverdam Creek at station 4ABDA003.63



6.2. TMDL

A Total Maximum Daily Load (TMDL) consists of 1) point source/waste load allocations (WLAs), 2) non-point sources/load allocations (LAs) where the non-point sources include natural/background levels, and 3) a margin of safety (MOS) where the margin of safety may be implicitly or explicitly defined. This TMDL definition is typically illustrated by the following equation:

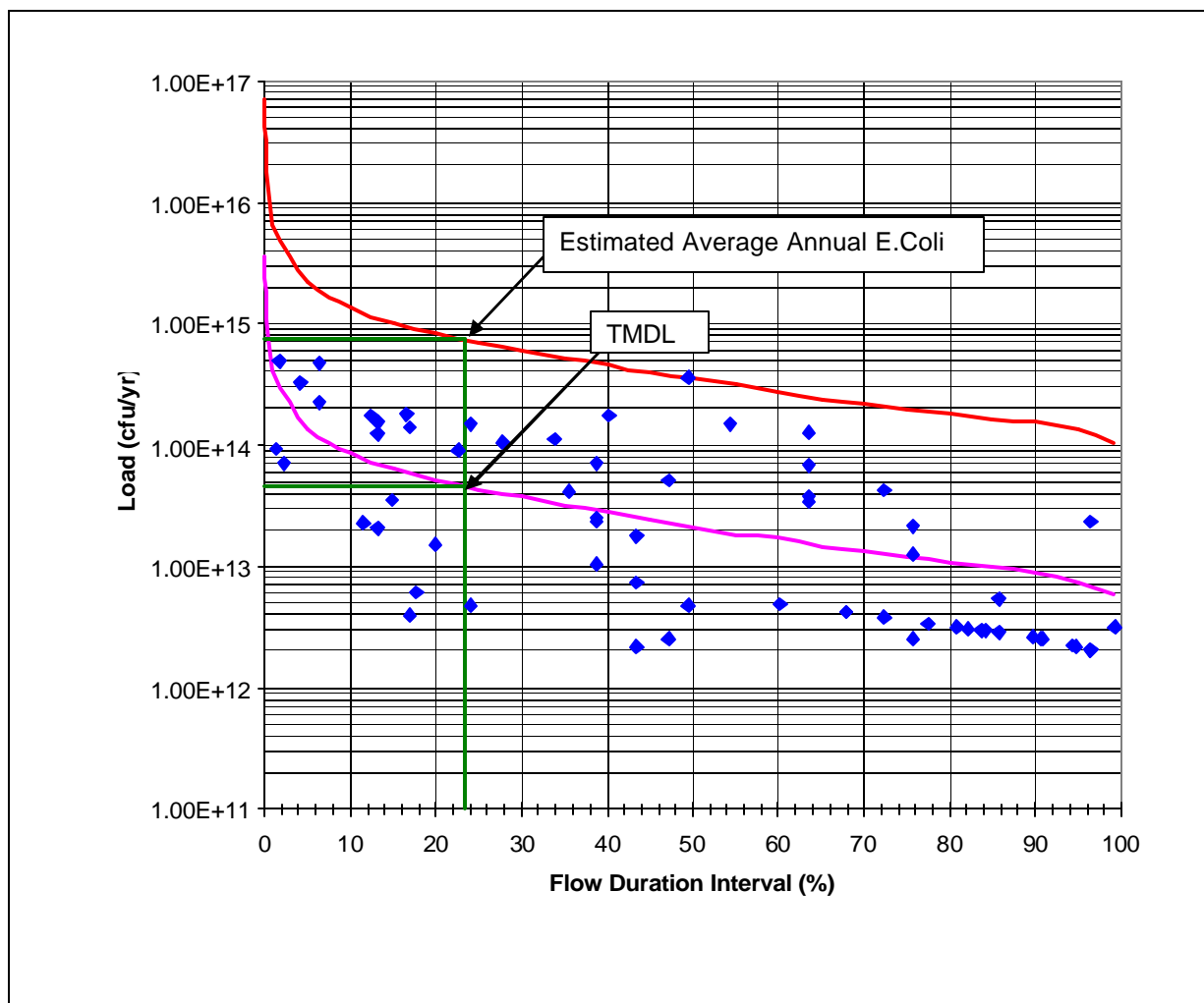
$$TMDL = WLAs + LAs + MOS$$

Simply put, a TMDL is the amount of a pollutant that can be present in a waterbody where the waterbody will still meet water quality standards for that pollutant. In the case of load-duration bacteria TMDLs, the TMDL is expressed as the total number of colony forming units (cfu) per year as opposed to cfu/day. This is because the load-duration TMDL must be based on the average annual flow condition.

The average annual flow for Beaverdam Creek is calculated from the average annual flow from the reference steam gage. The estimated average annual flow for Beaverdam Creek is 21.24 cfs. This flow value has an associated flow duration of 23.5%. From this information, an average annual *E. coli* load

and TMDL can be calculated from the max-exceedance and TMDL curves. This is represented graphically in Figure 14. The full calculation is presented in Appendix C.

Figure 14. Load duration curve illustrating the TMDL and estimated average annual *E. Coli* load for Beaverdam Creek at station 4ABDA003.63



The average annual *E. coli* load is 7.24×10^{14} cfu/yr, and the TMDL under average annual flow conditions is 4.46×10^{13} cfu/yr. These values are used to calculate required reductions. By subtracting the waste load allocation (known value) from the TMDL (as determined above), the load allocation can be determined. These three values are presented in Table 12.

Table 12. Average annual *E. coli* loads and TMDL for Beaverdam Creek watershed (cfu/yr)

WLA ¹	LA	MOS	TMDL
1.39×10^{10}	4.46×10^{13}	(implicit)	4.46×10^{13}

¹ There are 3 permitted discharges in the Beaverdam Creek watershed (see Table 7)

7. Allocations

Reduction

The annual average TMDL and *E. coli* load values from section 6.2, together with the waste load allocation, were plugged into Table 13 to determine the required reduction. The full calculations are presented in Appendix C.

Table 13. TMDL and required reduction for Beaverdam Creek

Allowable Loads (cfu/yr)		Average Annual EC Load (cfu/yr)	Required Reduction
Waste Load Allocation (WLA)	1.39×10^{10}		
Load Allocation (LA)	4.46×10^{13}		
MOS	(implicit)		
TMDL (annual average)	4.46×10^{13}	7.24×10^{14}	94%

As illustrated in Table 12 and 13, the WLA for the Beaverdam Creek watershed has no effect on the LA reduction calculations. The WLA represents <1% of the TMDL load.

Margin of Safety

This requirement is intended to add a level of safety to account for any inherent uncertainty in the TMDL development process and the data used in the development. The MOS may be either implicit or explicit. An implicit margin of safety relies on the conservative nature of the assumptions, values, and methods used to calculate a TMDL whereas an explicit margin of safety is a value (typically a percentage) applied at some point during the TMDL calculation.

In the Beaverdam Creek TMDL, an implicit MOS was incorporated through the use of conservative analytical assumptions. These include: (1) the use of the single-most extreme water quality violation event which was used to develop maximum exceedance curve over the entire range of flow conditions, and (2) the computation of average annual load using the average flow conditions. In addition, the load duration method of TMDL development has been evaluated against TMDLs that were developed using computer modeling. The results showed the load duration method to be slightly more conservative.

Allocations

In order to apply the reduction calculated above, the average annual *E. coli* load had to be allocated to each of the four non-point sources identified in the BST analysis. Table 14 shows the distribution of the average annual *E. coli* load among sources, the reduction applied to each source, and the allowable loading for each source.

Table 14. Average annual load distribution, reduction, and allowable load by source

	Total (cfu/yr)	Human @ 15% (cfu/yr)	Pet @ 21% (cfu/yr)	Livestock @ 27% (cfu/yr)	Wildlife @ 37% (cfu/yr)
Average Annual Load	7.24×10^{14}	1.09×10^{14}	1.52×10^{14}	1.95×10^{14}	2.68×10^{14}
Reduction	94%	99%	99%	99%	85.5%
Allowable Annual Load	4.46×10^{13}	1.09×10^{12}	1.52×10^{12}	1.95×10^{12}	3.88×10^{13}

7.1. Consideration of Critical Conditions

EPA regulations at 40 CFR 130.7 (c)(1) require TMDLs to take into account critical conditions for stream flow, loading, and water quality parameters. The intent of this requirement is to ensure that the water quality of Beaverdam Creek is protected during times when it is most vulnerable.

Critical conditions are important because they describe the factors that combine to cause a violation of water quality standards and will help in identifying the actions that may have to be undertaken to meet water quality standards. The sources of bacteria for Beaverdam Creek are a mixture of dry and wet weather driven sources. TMDL development utilizing the load-duration approach applies to the full range of flow conditions; therefore, the critical conditions for Beaverdam Creek were addressed during TMDL development.

7.2. Consideration of Seasonal Variations

Seasonal variations involve changes in stream flow and water quality as a result of hydrologic and climatological patterns. The load-duration approach allows the pattern of water quality exceedances to be examined for seasonal variations. The load-duration method used to develop this TMDL implicitly incorporates the seasonal variations of precipitation and runoff by looking at the highest water quality violation and applying it to the entire stream flow record when calculating the TMDL.

8. Implementation and Reasonable Assurance

Once a TMDL has been approved by EPA, measures must be taken to reduce pollution levels from both point and non point sources in the stream (see section 7.4.2). For point sources, all new or revised VPDES/NPDES permits must be consistent with the TMDL WLA pursuant to 40 CFR '122.44 (d)(1)(vii)(B) and must be submitted to EPA for approval. The measures for non point source reductions, which can include the use of better treatment technology and the installation of best management practices (BMPs), are implemented in an iterative process that is described along with specific BMPs in the implementation plan. The process for developing an implementation plan has been described in the "TMDL Implementation Plan Guidance Manual", published in July 2003 and available upon request from the DEQ and DCR TMDL project staff or at <http://www.deq.virginia.gov/tmdl/implans/ipguide.pdf>. With successful completion of implementation plans, local stakeholders will have a blueprint to restore impaired waters and enhance the value of their land and water resources. Additionally, development of an approved implementation plan may enhance opportunities for obtaining financial and technical assistance during implementation.

8.1. TMDL Implementation Process

In general, Virginia intends for the required bacteria reductions to be implemented in an iterative process that first addresses those sources with the largest impact on water quality. For example, in agricultural areas of the watershed, the most promising management practice is livestock exclusion from streams. This has been shown to be very effective in lowering bacteria concentrations in streams, both by reducing the cattle deposits themselves and by providing additional riparian buffers.

Additionally, in both urban and rural areas, reducing the human bacteria loading from failing septic systems should be a primary implementation focus because of its health implications. This component could be implemented through education on septic tank pump-outs as well as a septic system repair/replacement program and the use of alternative waste treatment systems.

In urban areas, reducing the human bacteria loading from leaking sewer lines could be accomplished through a sanitary sewer inspection and management program. Other BMPs that might be appropriate for controlling urban wash-off from parking lots and roads and that could be readily implemented may include more restrictive ordinances to reduce fecal loads from pets, improved garbage collection and control, and improved street cleaning.

The iterative implementation of BMPs in the watershed has several benefits:

1. It enables tracking of water quality improvements following BMP implementation through follow-up stream monitoring;
2. It provides a measure of quality control, given the uncertainties inherent in computer simulation modeling;
3. It provides a mechanism for developing public support through periodic updates on BMP implementation and water quality improvements;
4. It helps ensure that the most cost effective practices are implemented first; and
5. It allows for the evaluation of the adequacy of the TMDL in achieving water quality standards.

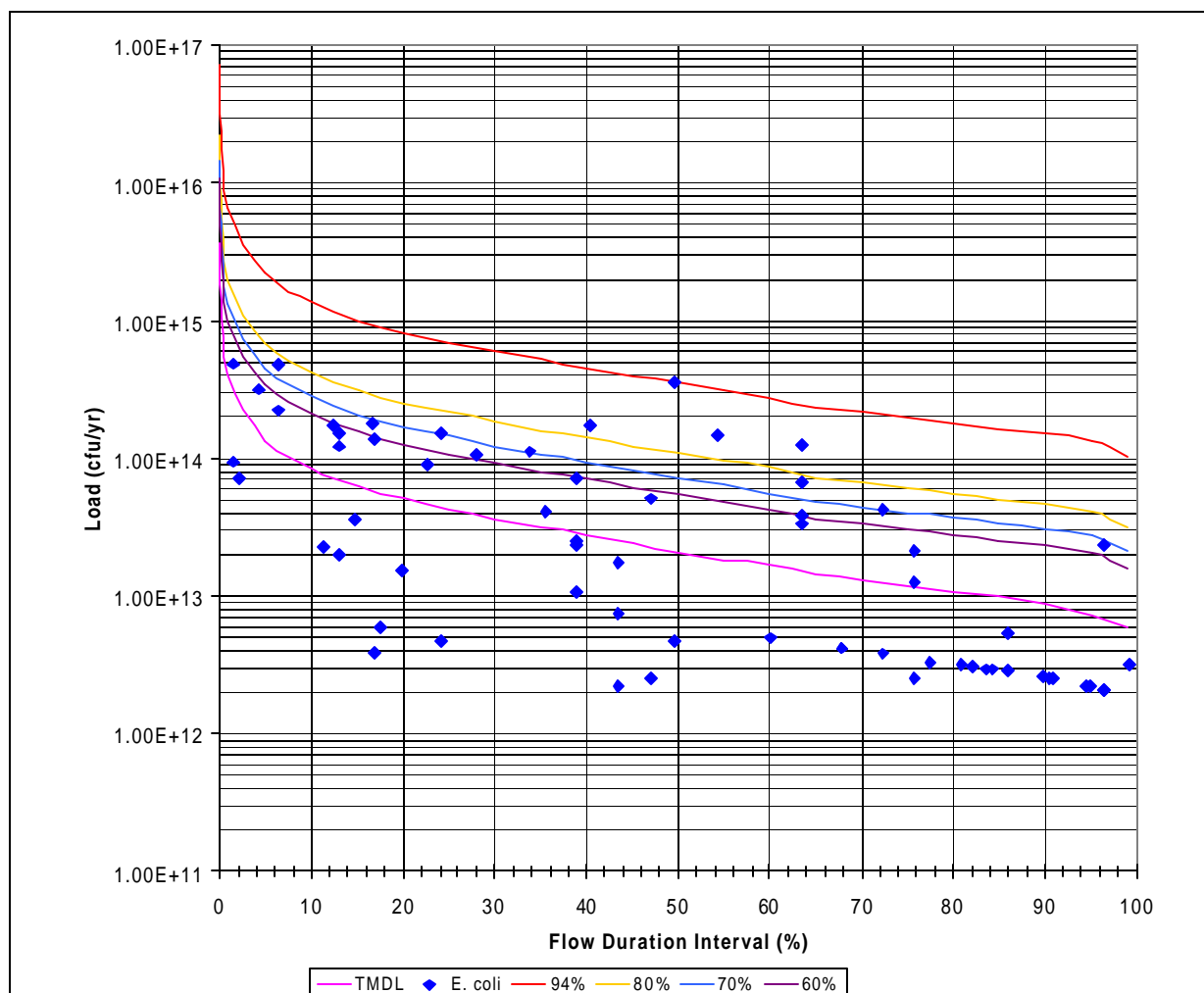
Watershed stakeholders will have opportunity to participate in the development of the TMDL implementation plan. While specific goals for BMP implementation will be established as part of the implementation plan development, the following stage 1 scenarios are targeted at controllable, anthropogenic bacteria sources and can serve as starting points for targeting BMP implementation activities.

8.2. Stage I Implementation Goal

The goal of the stage 1 scenarios is to reduce the bacteria loadings from controllable sources (excluding wildlife) such that violations of the single sample maximum criterion (235 cfu/100mL) are less than 10 percent. The stage 1 scenarios were generated with the same model setup as was used for the TMDL allocation scenarios.

As stated in Section 7.0 the TMDL requires a 94% reduction in non-point source loading in order to attain a 0% violation of water quality standards. In order to evaluate interim reduction goals for a phased implementation plan, several reduction levels and their associated violation rates were assessed. Reduction curves similar to the max exceedance/reduction curve of Figure 14 were plotted on the Beaverdam Creek load-duration curve. These reduction curves are presented in Figure 15.

Figure 15. Load duration curve illustrating the TMDL and reduction curves for Beaverdam Creek at station 4ABDA003.63



The theoretical violation rates for the various load reductions presented in Figure 13 are presented below in Table 15.

Table 15. Load Reductions and WQS Violation Rates

Load Reduction	Violation Rate
94%	0%
80%	6%

70%	9%
60%	19%
Current Load	42%

Based on the reduction analysis presented above and a goal of measurable water quality improvement, a suitable Phase I reduction level would be 70%. Table 16 presents the Phase I load allocations based on a 70% reduction of in-stream loads.

Table 16. Phase I Load Allocations (based on a 70% reduction)

	Total (cfu/yr)	Human (cfu/yr)	Pet (cfu/yr)	Livestock (cfu/yr)	Wildlife (cfu/yr)
Average Annual Load	7.24×10^{14}	1.09×10^{14}	1.52×10^{14}	1.95×10^{14}	2.68×10^{14}
Reduction	70%	99%	99%	99%	20%
Target Annual Load	2.17×10^{14}	1.09×10^{12}	1.52×10^{12}	1.95×10^{12}	2.14×10^{14}

In order to provide some insight into the nature of Beaverdam Creek water quality violations and to better target possible BMPs, the correlation between violations, stream flow change, and local precipitation was examined.

Results indicate that approximately 71% of the violations occurred during times of precipitation and increasing stream flow or just after a precipitation event with stable or decreasing stream flow. This suggests that those violations could be related to runoff events. The complete analysis is presented in Appendix E.

BMPs effective in correcting dry weather/low-flow violations of the bacteria water quality standard typically include: streamside fencing for cattle exclusion, straight pipe replacement, and septic system repair. Among some of the BMPs effective in reducing bacteria runoff from precipitation events include: riparian buffers zone, retention ponds/basins, range and pasture management, and animal waste management. Detailed lists of BMPs and their relative effectiveness will be presented in the eventual TMDL implementation plan for the Beaverdam Creek watershed.

8.3. Link to Ongoing Restoration Efforts

The local Peaks of Otter Soil and Water Conservation District (POSWCD), in recent years, have made progress in implementing Best Management Practices (BMP) in nearby watersheds. However, current available BMP monies are limited in the watershed. DEQ and POSWCD believe additional grants monies through the TMDL program would be greatly beneficial to reach members of the community that have not yet participated in BMP programs.

8.4. Reasonable Assurance for Implementation

8.4.1. Follow-Up Monitoring

Following the development of the TMDL, the DEQ will make every effort to continue to monitor the impaired stream in accordance with its ambient monitoring program. DEQ's Ambient Watershed Monitoring Plan for conventional pollutants calls for watershed monitoring to take place on a rotating basis, bi-monthly for two consecutive years of a six-year cycle. In accordance with [DEQ Guidance Memo No. 03-2004](#), during periods of reduced resources, monitoring can temporarily discontinue until the TMDL staff determines that implementation measures to address the source(s) of impairments are being installed. Monitoring can resume at the start of the following fiscal year, next scheduled monitoring station rotation, or where deemed necessary by the regional office or TMDL staff, as a new special study.

The purpose, location, parameters, frequency, and duration of the monitoring will be determined by the DEQ staff, in cooperation with DCR staff, the Implementation Plan Steering Committee and local stakeholders. Whenever possible, the location of the follow-up monitoring station(s) will be the same as the listing station. At a minimum, the monitoring station must be representative of the original impaired segment. The details of the follow-up monitoring will be outlined in the Annual Water Monitoring Plan prepared by each DEQ Regional Office. Other agency personnel, watershed stakeholders, etc. may provide input on the Annual Water Monitoring Plan. These recommendations must be made to the DEQ regional TMDL coordinator by September 30 of each year.

DEQ staff, in cooperation with DCR staff, the Implementation Plan Steering Committee and local stakeholders, will continue to use data from the ambient monitoring stations to evaluate reductions in pollutants ("water quality milestones" as established in the IP), the effectiveness of the TMDL in attaining and maintaining water quality standards, and the success of implementation efforts. Recommendations may then be made, when necessary, to target implementation efforts in specific areas and continue or discontinue monitoring at follow-up stations.

In some cases, watersheds will require monitoring above and beyond what is included in DEQ's standard monitoring plan. Ancillary monitoring by citizens', watershed groups, local government, or universities is an option that may be used in such cases. An effort should be made to ensure that ancillary monitoring follows established QA/QC guidelines in order to maximize compatibility with DEQ monitoring data. In instances where citizens' monitoring data is not available and additional monitoring is needed to assess the effectiveness of targeting efforts, TMDL staff may request of the monitoring managers in each regional office an increase in the number of stations or monitor existing stations at a higher frequency in the watershed. The additional monitoring beyond the original bimonthly single station monitoring will be contingent on staff resources and available laboratory budget. More information on citizen monitoring in Virginia and QA/QC guidelines is available at <http://www.deq.virginia.gov/cmonitor/>.

To demonstrate that the watershed is meeting water quality standards in watersheds where corrective actions have taken place (whether or not a TMDL or TMDL Implementation Plan has been completed), DEQ must meet the minimum data requirements from the original listing station or a station representative of the originally listed segment. The minimum data requirement for conventional pollutants (bacteria, dissolved oxygen, etc) is bimonthly monitoring for two consecutive years. For biological monitoring, the

minimum requirement is two consecutive samples (one in the spring and one in the fall) in a one year period.

8.4.2. Regulatory Framework

While section 303(d) of the Clean Water Act and current EPA regulations do not require the development of TMDL implementation plans as part of the TMDL process, they do require reasonable assurance that the load and wasteload allocations can and will be implemented. EPA also requires that all new or revised National Pollutant Discharge Elimination System (NPDES) permits must be consistent with the TMDL WLA pursuant to 40 CFR §122.44 (d)(1)(vii)(B). All such permits should be submitted to EPA for review.

Additionally, Virginia's 1997 Water Quality Monitoring, Information and Restoration Act (the "Act") directs the State Water Control Board to "develop and implement a plan to achieve fully supporting status for impaired waters" (Section 62.1-44.19.7). The Act also establishes that the implementation plan shall include the date of expected achievement of water quality objectives, measurable goals, corrective actions necessary and the associated costs, benefits and environmental impacts of addressing the impairments. EPA outlines the minimum elements of an approvable implementation plan in its 1999 "Guidance for Water Quality-Based Decisions: The TMDL Process." The listed elements include implementation actions/management measures, timelines, legal or regulatory controls, time required to attain water quality standards, monitoring plans and milestones for attaining water quality standards.

For the implementation of the WLA component of the TMDL, the Commonwealth intends to utilize the Virginia NPDES (VPDES) program, which typically includes consideration of the WQMIRA requirements during the permitting process. Requirements of the permit process should not be duplicated in the TMDL process, and with the exception of stormwater related permits, permitted sources are not usually addressed during the development of a TMDL implementation plan.

For the implementation of the TMDL's LA component, a TMDL implementation plan addressing at a minimum the WQMIRA requirements will be developed. An exception are the municipal separate storm sewer systems (MS4s) which are both covered by NPDES permits and expected to be included in TMDL implementation plans, as described in the stormwater permit section below.

Watershed stakeholders will have opportunities to provide input and to participate in the development of the TMDL implementation plan. Regional and local offices of DEQ, DCR, and other cooperating agencies are technical resources to assist in this endeavor.

In response to a Memorandum of Understanding (MOU) between EPA and DEQ, DEQ also submitted a draft Continuous Planning Process to EPA in which DEQ commits to regularly updating the WQMPs. Thus, the WQMPs will be, among other things, the repository for all TMDLs and TMDL implementation plans developed within a river basin.

DEQ staff will present both EPA-approved TMDLs and TMDL implementation plans to the State Water Control Board for inclusion in the appropriate Water Quality Management Plan (WQMP), in accordance with the Clean Water Act's Section 303(e) and Virginia's Public Participation Guidelines for Water Quality Management Planning.

DEQ staff will also request that the SWCB adopt TMDL WLAs as part of the Water Quality Management Planning Regulation (9VAC 25-720), except in those cases when permit limitations are equivalent to numeric criteria contained in the Virginia Water Quality Standards, such as is the case for bacteria. This regulatory action is in accordance with §2.2-4006A.4.c and §2.2-4006B of the Code of Virginia. SWCB actions relating to water quality management planning are described in the public participation guidelines referenced above and can be found on DEQ's web site under <http://www.deq.state.va.us/tmdl/pdf/ppp.pdf>

8.4.3. Implementation Funding Sources

Cooperating agencies, organizations and stakeholders must identify potential funding sources available for implementation during the development of the implementation plan in accordance with the “Virginia Guidance Manual for Total Maximum Daily Load Implementation Plans”. Potential sources for implementation may include the U.S. Department of Agriculture’s Conservation Reserve Enhancement and Environmental Quality Incentive Programs, EPA Section 319 funds, the Virginia State Revolving Loan Program, Virginia Agricultural Best Management Practices Cost-Share Programs, the Virginia Water Quality Improvement Fund, tax credits and landowner contributions. The TMDL Implementation Plan Guidance Manual contains additional information on funding sources, as well as government agencies that might support implementation efforts and suggestions for integrating TMDL implementation with other watershed planning efforts.

8.4.4. Attainability of Primary Contact Recreation Use

In some streams for which TMDLs have been developed, water quality modeling indicates that even after removal of all bacteria sources (other than wildlife), the stream will not attain standards under all flow regimes at all times. These streams may not be able to attain standards without some reduction in wildlife load.

With respect to these potential reductions in bacteria loads attributed to wildlife, Virginia and EPA are not proposing the elimination of wildlife to allow for the attainment of water quality standards. However, if bacteria levels remain high and localized overabundant populations of wildlife are identified as the source, then measures to reduce such populations may be an option if undertaken in consultation with the Department of Game and Inland Fisheries (DGIF) or the United States Fish and Wildlife Service (USFWS). Additional information on DGIF’s wildlife programs can be found at http://www.dgif.virginia.gov/hunting/va_game_wildlife/. While managing such overpopulations of wildlife remains as an option to local stakeholders, the reduction of wildlife or changing a natural background condition is not the intended goal of a TMDL.

To address the overall issue of attainability of the primary contact criteria, Virginia proposed during its latest triennial water quality standards review a new “secondary contact” category for protecting the recreational use in state waters. On March 25, 2003, the Virginia State Water Control Board adopted criteria for “secondary contact recreation” which means “a water-based form of recreation, the practice of which has a low probability for total body immersion or ingestion of waters (examples include but are not limited to wading, boating and fishing)”. These new criteria became effective on February 12, 2004 and can be found at <http://www.deq.virginia.gov/wqs/rule.html>.

In order for the new criteria to apply to a specific stream segment, the primary contact recreational use must be removed. To remove a designated use, the state must demonstrate 1) that the use is not an existing use, 2) that downstream uses are protected, and 3) that the source of contamination is natural and uncontrollable by effluent limitations and by implementing cost-effective and reasonable best management practices for nonpoint source control (9 VAC 25-260-10). This and other information is collected through a special study called a Use Attainability Analysis (UAA). All site-specific criteria or designated use changes must be adopted as amendments to the water quality standards regulations. Watershed stakeholders and EPA will be able to provide comment during this process. Additional information can be obtained at <http://www.deq.virginia.gov/wqs/WQS03AUG.pdf>

The process to address potentially unattainable reductions based on the above is as follows: First is the development of a stage 1 scenario such as those presented previously in this chapter. The pollutant reductions in the stage 1 scenario are targeted primarily at the controllable, anthropogenic bacteria sources identified in the TMDL, setting aside control strategies for wildlife except for cases of nuisance populations. During the implementation of the stage 1 scenario, all controllable sources would be reduced to the maximum extent practicable using the iterative approach described in Section 8.2 above. DEQ will re-assess water quality in the stream during and subsequent to the implementation of the stage 1 scenario to determine if the water quality standard is attained. This effort will also evaluate if the modeling assumptions were correct. If water quality standards are not being met, and no additional cost-

effective and reasonable best management practices can be identified, a UAA may be initiated with the goal of re-designating the stream for secondary contact recreation.

9.0 Public Participation

The development of the Beaverdam Creek TMDL would not have been possible without public participation. A public meeting was held in Moneta, Virginia on March 14, 2006 to discuss the process for TMDL development and the source assessment input. Nine people attended. Copies of the presentation materials and the draft TMDL report were available for public distribution. The meeting was public noticed in the Virginia Register. There was a 30 day-public comment period and zero written comment were received.

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Appendix A

Glossary

GLOSSARY

Note: All entries in italics are taken from USEPA (1998). All non-italicized entries are taken from MapTech (2002).

303(d). A section of the Clean Water Act of 1972 requiring states to identify and list water bodies that do not meet the states' water quality standards.

Allocations. *That portion of a receiving water's loading capacity attributed to one of its existing or future pollution sources (nonpoint or point) or to natural background sources. (A wasteload allocation [WLA] is that portion of the loading capacity allocated to an existing or future point source, and a load allocation [LA] is that portion allocated to an existing or future nonpoint source or to natural background levels. Load allocations are best estimates of the loading, which can range from reasonably accurate estimates to gross allotments, depending on the availability of data and appropriate techniques for predicting loading.)*

Ambient water quality. *Natural concentration of water quality constituents prior to mixing of either point or nonpoint source load of contaminants. Reference ambient concentration is used to indicate the concentration of a chemical that will not cause adverse impact on human health.*

Anthropogenic. *Pertains to the [environmental] influence of human activities.*

Antidegradation Policies. *Policies that are part of each states water quality standards. These policies are designed to protect water quality and provide a method of assessing activities that might affect the integrity of waterbodies.*

Background levels. *Levels representing the chemical, physical, and biological conditions that would result from natural geomorphological processes such as weathering or dissolution.*

Bacteria. *Single-celled microorganisms. Bacteria of the coliform group are considered the primary indicators of fecal contamination and are often used to assess water quality.*

Bacterial source tracking (BST). A collection of scientific methods used to track sources of fecal contamination.

Best management practices (BMPs). *Methods, measures, or practices determined to be reasonable and cost-effective means for a landowner to meet certain, generally nonpoint source, pollution control needs. BMPs include structural and nonstructural controls and operation and maintenance procedures.*

Biosolids. Biologically treated solids originating from municipal wastewater treatment plants.

Clean Water Act (CWA). *The Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972), Public Law 92-500, as amended by Public Law 96-483 and Public Law 97-117, 33 U.S.C. 1251 et seq. The Clean Water Act (CWA) contains a number of provisions to restore and maintain the quality of the nation's water resources. One of these provisions is section 303(d), which establishes the TMDL program.*

Concentration. Amount of a substance or material in a given unit volume of solution; usually measured in milligrams per liter (mg/L) or parts per million (ppm).

Concentration-based limit. A limit based on the relative strength of a pollutant in a waste stream, usually expressed in milligrams per liter (mg/L).

Confluence. The point at which a river and its tributary flow together.

Contamination. The act of polluting or making impure; any indication of chemical, sediment, or biological impurities.

Cost-share program. A program that allocates project funds to pay a percentage of the cost of constructing or implementing a best management practice. The remainder of the costs is paid by the producer(s).

Critical condition. The critical condition can be thought of as the "worst case" scenario of environmental conditions in the waterbody in which the loading expressed in the TMDL for the pollutant of concern will continue to meet water quality standards. Critical conditions are the combination of environmental factors (e.g., flow, temperature, etc.) that results in attaining and maintaining the water quality criterion and has an acceptably low frequency of occurrence.

Designated uses. Those uses specified in water quality standards for each waterbody or segment whether or not they are being attained.

Dilution. The addition of some quantity of less-concentrated liquid (water) that results in a decrease in the original concentration.

Direct runoff. Water that flows over the ground surface or through the ground directly into streams, rivers, and lakes.

Discharge. Flow of surface water in a stream or canal, or the outflow of groundwater from a flowing artesian well, ditch, or spring. Can also apply to discharge of liquid effluent from a facility or to chemical emissions into the air through designated venting mechanisms.

Discharge permits (under NPDES). A permit issued by the U.S. EPA or a state regulatory agency that sets specific limits on the type and amount of pollutants that a municipality or industry can discharge to a receiving water; it also includes a compliance schedule for achieving those limits. The permit process was established under the National Pollutant Discharge Elimination System, under provisions of the Federal Clean Water Act.

DNA. Deoxyribonucleic acid. The genetic material of cells and some viruses.

Domestic wastewater. Also called sanitary wastewater, consists of wastewater discharged from residences and from commercial, institutional, and similar facilities.

Drainage basin. A part of a land area enclosed by a topographic divide from which direct surface runoff from precipitation normally drains by gravity into a receiving water. Also referred to as a watershed, river basin, or hydrologic unit.

Effluent. *Municipal sewage or industrial liquid waste (untreated, partially treated, or completely treated) that flows out of a treatment plant, septic system, pipe, etc.*

Effluent limitation. *Restrictions established by a state or EPA on quantities, rates, and concentrations in pollutant discharges.*

Endpoint. *An endpoint (or indicator/target) is a characteristic of an ecosystem that may be affected by exposure to a stressor. Assessment endpoints and measurement endpoints are two distinct types of endpoints commonly used by resource managers. An assessment endpoint is the formal expression of a valued environmental characteristic and should have societal relevance (an indicator). A measurement endpoint is the expression of an observed or measured response to a stress or disturbance. It is a measurable environmental characteristic that is related to the valued environmental characteristic chosen as the assessment endpoint. The numeric criteria that are part of traditional water quality standards are good examples of measurement endpoints (targets).*

Existing use. *Use actually attained in the waterbody on or after November 28, 1975, whether or not it is included in the water quality standards (40 CFR 131.3).*

Fecal Coliform. *Indicator organisms (organisms indicating presence of pathogens) associated with the digestive tract.*

Feedlot. *A confined area for the controlled feeding of animals. Tends to concentrate large amounts of animal waste that cannot be absorbed by the soil and, hence, may be carried to nearby streams or lakes by rainfall runoff.*

Geometric mean. *A measure of the central tendency of a data set that minimizes the effects of extreme values.*

GIS. *Geographic Information System. A system of hardware, software, data, people, organizations and institutional arrangements for collecting, storing, analyzing and disseminating information about areas of the earth. (Dueker and Kjerne, 1989)*

Ground water. *The supply of fresh water found beneath the earth's surface, usually in aquifers, which supply wells and springs. Because ground water is a major source of drinking water, there is growing concern over contamination from leaching agricultural or industrial pollutants and leaking underground storage tanks.*

Hydrograph. *A graph showing variation of stage (depth) or discharge in a stream over a period of time.*

Hydrologic cycle. *The circuit of water movement from the atmosphere to the earth and its return to the atmosphere through various stages or processes, such as precipitation, interception, runoff, infiltration, storage, evaporation, and transpiration.*

Hydrology. *The study of the distribution, properties, and effects of water on the earth's surface, in the soil and underlying rocks, and in the atmosphere.*

Indicator. *A measurable quantity that can be used to evaluate the relationship between pollutant sources and their impact on water quality.*

Indicator organism. *An organism used to indicate the potential presence of other (usually pathogenic) organisms. Indicator organisms are usually associated with the*

other organisms, but are usually more easily sampled and measured.

In situ. *In place; in situ measurements consist of measurements of components or processes in a full-scale system or a field, rather than in a laboratory.*

Isolate. *An inbreeding biological population that is isolated from similar populations by physical or other means.*

Limits (upper and lower). *The lower limit equals the lower quartile – 1.5x(upper quartile – lower quartile), and the upper limit equals the upper quartile + 1.5x(upper quartile – lower quartile). Values outside these limits are referred to as outliers.*

Loading, Load, Loading rate. *The total amount of material (pollutants) entering the system from one or multiple sources; measured as a rate in weight per unit time.*

Load allocation (LA). *The portion of a receiving waters loading capacity attributed either to one of its existing or future nonpoint sources of pollution or to natural background sources. Load allocations are best estimates of the loading, which can range from reasonably accurate estimates to gross allotments, depending on the availability of data and appropriate techniques for predicting the loading. Wherever possible, natural and nonpoint source loads should be distinguished (40 CFR 130.2(g)).*

Loading capacity (LC). *The greatest amount of loading a water can receive without violating water quality standards.*

Margin of safety (MOS). *A required component of the TMDL that accounts for the uncertainty about the relationship between the pollutant loads and the quality of the receiving waterbody (CWA section 303(d)(1)(C)). The MOS is normally incorporated into the conservative assumptions used to develop TMDLs (generally within the calculations or models) and approved by EPA either individually or in state/EPA agreements. If the MOS needs to be larger than that which is allowed through the conservative assumptions, additional MOS can be added as a separate component of the TMDL (in this case, quantitatively, a TMDL = LC = WLA + LA + MOS).*

Mathematical model. *A system of mathematical expressions that describe the spatial and temporal distribution of water quality constituents resulting from fluid transport and the one or more individual processes and interactions within some prototype aquatic ecosystem. A mathematical water quality model is used as the basis for waste load allocation evaluations.*

Mean. *The sum of the values in a data set divided by the number of values in the data set.*

MGD. *Million gallons per day. A unit of water flow, whether discharge or withdraw.*

Monitoring. *Periodic or continuous surveillance or testing to determine the level of compliance with statutory requirements and/or pollutant levels in various media or in humans, plants, and animals.*

Narrative criteria. *Nonquantitative guidelines that describe the desired water quality goals.*

National Pollutant Discharge Elimination System (NPDES). *The national program for issuing, modifying, revoking and re-issuing, terminating, monitoring, and enforcing*

permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of the Clean Water Act.

Natural waters. *Flowing water within a physical system that has developed without human intervention, in which natural processes continue to take place.*

Non-point source. *Pollution that originates from multiple sources over a relatively large area. Nonpoint sources can be divided into source activities related to either land or water use including failing septic tanks, improper animal-keeping practices, forest practices, and urban and rural runoff.*

Numeric targets. *A measurable value determined for the pollutant of concern, which, if achieved, is expected to result in the attainment of water quality standards in the listed waterbody.*

Organic matter. *The organic fraction that includes plant and animal residue at various stages of decomposition, cells and tissues of soil organisms, and substances synthesized by the soil population. Commonly determined as the amount of organic material contained in a soil or water sample.*

Peak runoff. *The highest value of the stage or discharge attained by a flood or storm event; also referred to as flood peak or peak discharge.*

Permit. *An authorization, license, or equivalent control document issued by EPA or an approved federal, state, or local agency to implement the requirements of an environmental regulation; e.g., a permit to operate a wastewater treatment plant or to operate a facility that may generate harmful emissions.*

Phased approach. *Under the phased approach to TMDL development, load allocations and wasteload allocations are calculated using the best available data and information recognizing the need for additional monitoring data to accurately characterize sources and loadings. The phased approach is typically employed when nonpoint sources dominate. It provides for the implementation of load reduction strategies while collecting additional data.*

Point source. *Pollutant loads discharged at a specific location from pipes, outfalls, and conveyance channels from either municipal wastewater treatment plants or industrial waste treatment facilities. Point sources can also include pollutant loads contributed by tributaries to the main receiving water stream or river.*

Pollutant. *Dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into water. (CWA section 502(6)).*

Pollution. *Generally, the presence of matter or energy whose nature, location, or quantity produces undesired environmental effects. Under the Clean Water Act, for example, the term is defined as the man-made or man-induced alteration of the physical, biological, chemical, and radiological integrity of water.*

Privately owned treatment works. *Any device or system that is (a) used to treat wastes from any facility whose operator is not the operator of the treatment works and (b) not a publicly owned treatment works.*

Public comment period. *The time allowed for the public to express its views and concerns regarding action by EPA or states (e.g., a Federal Register notice of a proposed rule-making, a public notice of a draft permit, or a Notice of Intent to Deny).*

Publicly owned treatment works (POTW). *Any device or system used in the treatment (including recycling and reclamation) of municipal sewage or industrial wastes of a liquid nature that is owned by a state or municipality. This definition includes sewers, pipes, or other conveyances only if they convey wastewater to a POTW providing treatment.*

Raw sewage. *Untreated municipal sewage.*

Receiving waters. *Creeks, streams, rivers, lakes, estuaries, ground-water formations, or other bodies of water into which surface water and/or treated or untreated waste are discharged, either naturally or in man-made systems.*

Restoration. *Return of an ecosystem to a close approximation of its presumed condition prior to disturbance.*

Riparian areas. *Areas bordering streams, lakes, rivers, and other watercourses. These areas have high water tables and support plants that require saturated soils during all or part of the year. Riparian areas include both wetland and upland zones.*

Riparian zone. *The border or banks of a stream. Although this term is sometimes used interchangeably with floodplain, the riparian zone is generally regarded as relatively narrow compared to a floodplain. The duration of flooding is generally much shorter, and the timing less predictable, in a riparian zone than in a river floodplain.*

Runoff. *That part of precipitation, snowmelt, or irrigation water that runs off the land into streams or other surface water. It can carry pollutants from the air and land into receiving waters.*

Septic system. *An on-site system designed to treat and dispose of domestic sewage. A typical septic system consists of a tank that receives waste from a residence or business and a drain field or subsurface absorption system consisting of a series of percolation lines for the disposal of the liquid effluent. Solids (sludge) that remain after decomposition by bacteria in the tank must be pumped out periodically.*

Sewer. *A channel or conduit that carries wastewater and storm water runoff from the source to a treatment plant or receiving stream. Sanitary sewers carry household, industrial, and commercial waste. Storm sewers carry runoff from rain or snow. Combined sewers handle both.*

Slope. *The degree of inclination to the horizontal. Usually expressed as a ratio, such as 1:25 or 1 on 25, indicating one unit vertical rise in 25 units of horizontal distance, or in a decimal fraction (0.04), degrees (2 degrees 18 minutes), or percent (4 percent).*

Stakeholder. *Any person with a vested interest in the TMDL development.*

Standard. *In reference to water quality (e.g. 200 cfu/100 ml geometric mean limit).*

Storm runoff. *Storm water runoff, snowmelt runoff, and surface runoff and drainage;*

rainfall that does not evaporate or infiltrate the ground because of impervious land surfaces or a soil infiltration rate lower than rainfall intensity, but instead flows onto adjacent land or into waterbodies or is routed into a drain or sewer system.

Streamflow. *Discharge that occurs in a natural channel. Although the term "discharge" can be applied to the flow of a canal, the word "streamflow" uniquely describes the discharge in a surface stream course. The term "streamflow" is more general than "runoff" since streamflow may be applied to discharge whether or not it is affected by diversion or regulation.*

Stream restoration. *Various techniques used to replicate the hydrological, morphological, and ecological features that have been lost in a stream because of urbanization, farming, or other disturbance.*

Surface area. *The area of the surface of a waterbody; best measured by planimetry or the use of a geographic information system.*

Surface runoff. *Precipitation, snowmelt, or irrigation water in excess of what can infiltrate the soil surface and be stored in small surface depressions; a major transporter of nonpoint source pollutants.*

Surface water. *All water naturally open to the atmosphere (rivers, lakes, reservoirs, ponds, streams, impoundments, seas, estuaries, etc.) and all springs, wells, or other collectors directly influenced by surface water.*

Topography. *The physical features of a geographic surface area including relative elevations and the positions of natural and man-made features.*

Total Maximum Daily Load (TMDL). *The sum of the individual wasteload allocations (WLAs) for point sources, load allocations (LAs) for nonpoint sources and natural background, plus a margin of safety (MOS). TMDLs can be expressed in terms of mass per time, toxicity, or other appropriate measures that relate to a state's water quality standard.*

Transport of pollutants (in water). *Transport of pollutants in water involves two main processes: (1) advection, resulting from the flow of water, and (2) dispersion, or transport due to turbulence in the water.*

Tributary. *A lower order-stream compared to a receiving waterbody. "Tributary to" indicates the largest stream into which the reported stream or tributary flows.*

Variance. *A measure of the variability of a data set. The sum of the squared deviations (observation – mean) divided by (number of observations) – 1.*

DACS. Virginia Department of Agriculture and Consumer Services.

DCR. Virginia Department of Conservation and Recreation.

DEQ. Virginia Department of Environmental Quality.

VDH. Virginia Department of Health.

Wasteload allocation (WLA). *The portion of a receiving waters' loading capacity that is*

allocated to one of its existing or future point sources of pollution. WLAs constitute a type of water quality-based effluent limitation (40 CFR 130.2(h)).

Wastewater. *Usually refers to effluent from a sewage treatment plant. See also Domestic wastewater.*

Wastewater treatment. *Chemical, biological, and mechanical procedures applied to an industrial or municipal discharge or to any other sources of contaminated water to remove, reduce, or neutralize contaminants.*

Water quality. *The biological, chemical, and physical conditions of a waterbody. It is a measure of a waterbody's ability to support beneficial uses.*

Water quality criteria. *Levels of water quality expected to render a body of water suitable for its designated use, composed of numeric and narrative criteria. Numeric criteria are scientifically derived ambient concentrations developed by EPA or states for various pollutants of concern to protect human health and aquatic life. Narrative criteria are statements that describe the desired water quality goal. Criteria are based on specific levels of pollutants that would make the water harmful if used for drinking, swimming, farming, fish production, or industrial processes.*

Water quality standard. *Law or regulation that consists of the beneficial designated use or uses of a waterbody, the numeric and narrative water quality criteria that are necessary to protect the use or uses of that particular waterbody, and an antidegradation statement.*

Watershed. *A drainage area or basin in which all land and water areas drain or flow toward a central collector such as a stream, river, or lake at a lower elevation.*

WQIA. Water Quality Improvement Act.

Appendix B

Antibiotic Resistance Analysis (MapTech)

When performing ARA, isolates (colonies picked from membrane filtration plates) of *E. coli* or *Enterococcus* are transferred to a 96-well tissue culture plate (one isolate per well) containing a selective liquid medium. The 96-well plates are incubated and confirmed as *E. coli* or *Enterococcus* by color changes in the liquid after incubation (Figure 1). Antibiotic stock solutions are prepared and each of twentyeight or more antibiotic/concentrations is added separately to flasks of autoclaved and cooled Trypticase Soy Agar (TSA) from the stock solutions to achieve the desired concentration, and then poured into sterile 15x100mm petri dishes.

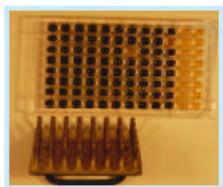


Figure 1. 96-well plate after incubation.

Control plates (no antibiotics) are included with each set. Isolates are transferred from the 96-well plate using a stainless steel 48-prong replica plater (Sigma). The replicator is flame-sterilized (95% ethanol) after inoculation of each TSA plate. Resistance to an antibiotic is determined by comparing each isolate to the growth of that isolate on the control plate. A one (1) is recorded for growth and a zero (0) is recorded for no growth (Figure 2). This is repeated for each isolate on each of the 30 antibiotic plates to develop a profile.

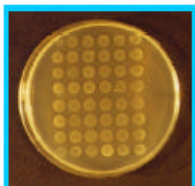


Figure 2. TSA control plate (with no antibiotics) showing growth of all 48 isolates.

The profile is then compared against the known source library to determine the source of the isolate (see data analysis section). The basic process is the same for all approaches, that is, a data base of known sources analyzed using the BST method of choice must be developed and samples of unknown bacterial origin are collected, analyzed and compared to the known source database. For studies, such as Total Maximum Daily Loads (TMDL), we recommend the ARA procedure due to typical cost constraints. Typically we analyze 24 isolates per unknown source (e.g. stream or well water) sample. This provides measurements of the proportion of a given source that are in increments of approximately 4%. If more precision is required, 48 isolates can be analyzed, resulting in resolution of approximately 2%. If the sampling is to be done in a geographical area where a database of known sources has not been developed, we will need to collect samples from known sources (i.e. human, livestock, wildlife) and compare them to our existing databases to determine if one of our existing databases is compatible with the study area. Twenty-four isolates from each of these samples will be analyzed. If no existing database is compatible, we will need to develop a database for the study area. The number of samples needed depend on variability of source samples. We have had a good deal of success in the past by using existing databases through obtaining known source samples from each group (i.e. human, livestock, wildlife) in the study area and comparing them to existing databases.

Appendix C

Calculations

Calculations

Allowable Load Calculation from Section 6.2.

$$\text{TMDL cfu/yr} = \frac{Q \text{ ft}^3/\text{s} * 7.48 \text{ gal}/\text{ft}^3 * 3.785 \text{ l}/\text{gal} * 1000 \text{ ml}/\text{l} * 235 \text{ cfu}/100 \text{ ml} * 60 \text{ s}/\text{min} * 60 \text{ min}/\text{day} * 24 \text{ hrs}/\text{day} * 365 \text{ days}/\text{yr}}{\text{days}/\text{yr}}$$

Where:

TMDL cfu/yr = Allowable load in cfu/yr

235 cfu/100 ml = Instantaneous *E. coli* standard

Q ft³/s = Flow in cubic feet per second

cfu = *E. coli* colony forming units.

l = liters

ml = milliliters

s = seconds

min = minutes

yr = year

gal = gallons

Required Reduction Calculation from Section 7.

$$\text{TMDL cfu/yr} = \text{LA cfu/yr} + \text{WLA cfu/yr} + \text{MOS (cfu/yr)}$$

$$\text{OL} = \text{LA cfu/yr} + \text{WLA cfu/yr}$$

$$\% \text{ reduction} = [(\text{OL} - \text{TMDL})/\text{OL}] * 100$$

Where:

TMDL = total maximum daily load

LA = load allocation

WLA = waste load allocation

MOS = margin of safety

OL = observed load (average annual load)

Appendix D

Reference Stream Selection

Once several possible reference watersheds are selected, a correlation analysis is performed on the flow measurements of the reference and target gauges. Usually the reference gauge with the strongest correlation to the target gauge is selected; however, the final decision is subject to best professional judgement. In some cases a watershed with a lower correlation may be a better choice.

The reference stream correlation is performed by entering the flow measurement data from the target stream (Beaverdam Creek) into an Excel spreadsheet along with daily mean flow data from the reference streams. The Excel "Correlation" data analysis tool is then run to determine "R" or the Pearson's correlation coefficient which can be used as an indication of the strength of the correlation. In this analysis absolute values of the Pearson's coefficient between 0-0.19 were regarded as indicating a very weak correlation, 0.2-0.39 as weak, 0.40-0.59 as moderate, 0.6-0.79 as strong and 0.8-1 as a very strong correlation.

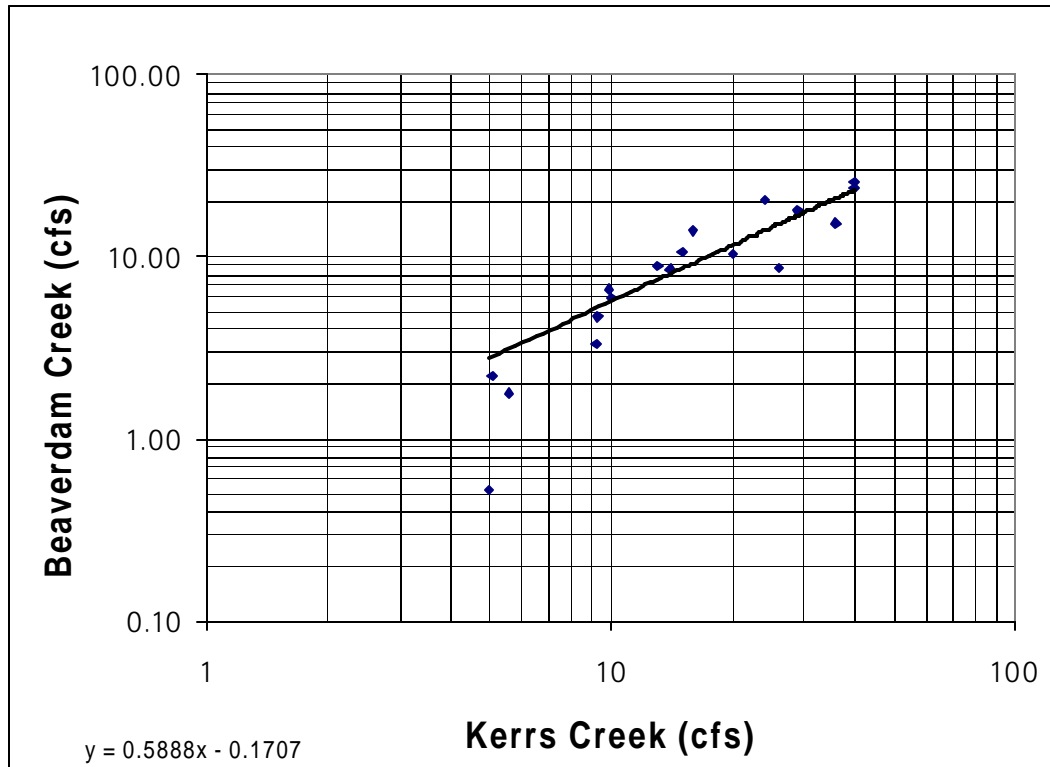
Flow data exists at the listing station (4ABDA003.63 located at Route 757). A basin size ratio is established by using the flow data from 4ABDA003.63 (VDEQ special study). Three potential reference gages were selected based on proximity, ecoregion, elevation, topography, drainage size, and land use. All three potential reference gages had high R values, but Kerrs Creek was selected as the reference stream based on proximity and similar land use. The Kerrs Creek gage is located in Rockbridge County near Lexington, Virginia and is in Hydrologic Unit Code 02080202. The dominant land use in the Kerrs Creek watershed is forest and agriculture, similar to the Beaverdam Creek watershed.

Station Name	Gage #	Drainage Area	Elevation	Topography	Ecoregion	R-squared
Beaverdam Creek	Route 755	27.2 sq mi	787 ft	high	Piedmont	
Kerrs Creek	2022500	35 sq mi	980 ft	high	CARV	0.93
Battle Run	1662800	27 sq mi	600 ft	high	Northern Piedmont*	0.92
Catawba Creek	2018500	34.3 sq mi	640ft	high	CARV*	0.87

*CARV = Central Appalachian Ridge and Valley

Once Kerrs Creek was determined to represent the best reference gage (see Figure below), the basin size ratio was calculated. Kerrs Creek is 35 square miles at the stream gage and Beaverdam Creek is 27.2 square miles at Route 757. This ratio was used to create a continuous flow record for the Beaverdam Creek watershed.

Flow Regression for Beaverdam Creek and Kerrs Creek



Appendix E

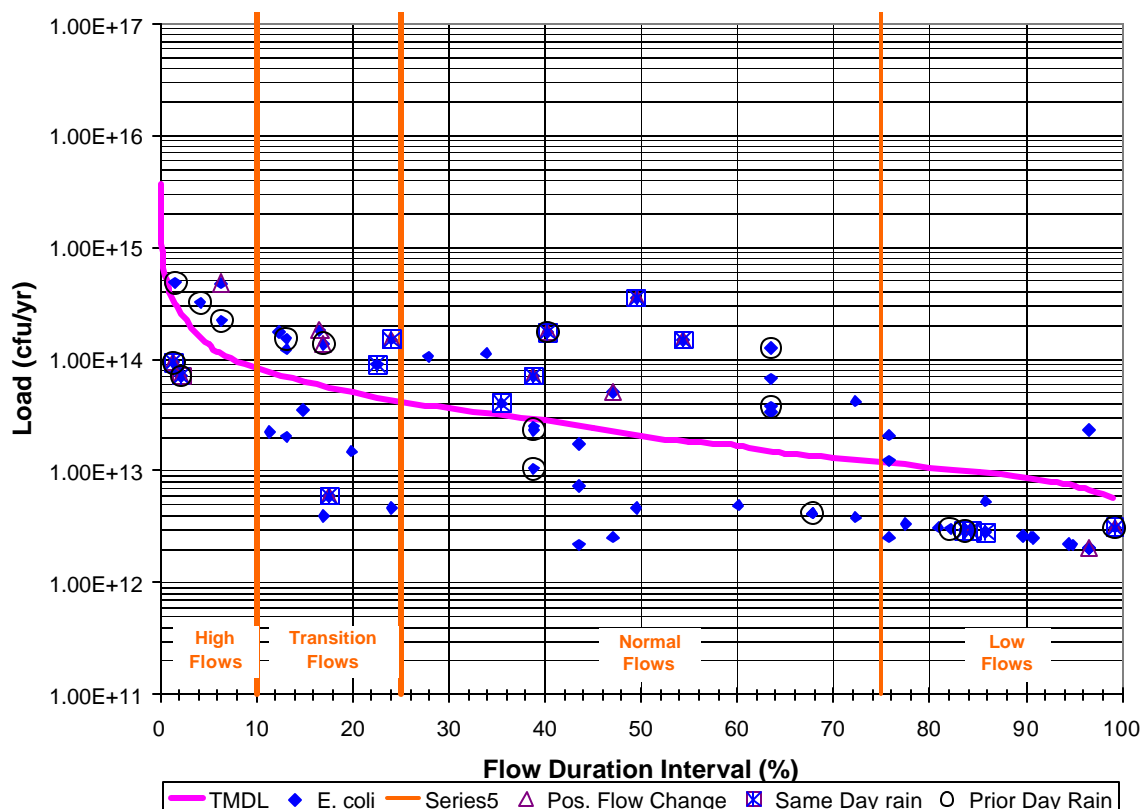
Flow Change and Precipitation Analysis

In the interest of better-targeted BMPs for the Beaverdam Creek watershed, the correlation between water quality violations, stream flow changes and precipitation was investigated. The goal was to determine which violations might be related to runoff and which might be related to direct deposition.

As stated in Section 6.1.2 on flow data, a reference stream gage on the Kerrs Creek was used to create a flow duration curve for the Beaverdam Creek watershed. To assess the link between flow changes and precipitation events, precipitation records from the Bedford, VA weather station (COOP ID 551), located approximately 12 miles south of the Beaverdam Creek watershed, were examined. Precipitation events on the day before and on the day of each violation were examined. Precipitation events on the day before the violation were examined to see if decreasing flows on violation days were the result of a precipitation event within the preceding 24 hours.

Results of the study are presented graphically and in tabular format below.

Precipitation and Flow Annotated WQS Violation Events (Beaverdam Creek Watershed)



Sampling Date	Fecal Coliform (cfu/100 mL)	Translated <i>E. coli</i> Value (cfu/100 mL)	Duration Interval	<i>E. coli</i> Load (cfu/yr)	Increasing Flow (refer to Target Stream Flow spreadsheet)	Same Day Rain (inches)	Prior Day Rain (inches)
08/20/92	100	68	82.1	3.05E+12	No	0	0.59
09/20/93	100	68	89.7	2.62E+12	No	0	0
12/13/93	100	68	60.1	4.91E+12	No	0	0
03/10/94	100	68	2.2	7.04E+13	Yes	0.31	0.02
06/13/94	3700	1880	63.5	1.26E+14	No	0	0.02
09/15/94	100	68	77.5	3.33E+12	No	0	0
12/12/94	1000	565	63.5	3.78E+13	No	0	0.6
03/21/95	1000	565	38.8	7.04E+13	Yes	0.1	0
09/11/95	200	129	85.8	5.35E+12	No	0	0
12/19/95	1800	970	6.3	4.78E+14	Yes	no data	no data
03/12/96	100	68	19.9	1.49E+13	No	0	0
06/05/96	2800	1455	40.3	1.74E+14	Yes	0.67	0.79
09/09/96	1000	565	12.4	1.74E+14	No	0	0
12/10/96	100	68	11.4	2.24E+13	No	0	0
03/10/97	100	68	13.1	2.03E+13	No	0	0
06/05/97	900	513	13.1	1.53E+14	No	0	0.18
09/02/97	100	68	90.6	2.54E+12	No	0	0
12/08/97	100	68	72.3	3.83E+12	No	0	0
03/09/98	100	68	1.4	9.33E+13	Yes	1.05	0.6
06/22/98	100	68	43.5	7.41E+12	No	0	0
09/15/98	100	68	94.4	2.22E+12	No	0	0
12/07/98	100	68	96.5	2.04E+12	No	0	0
03/11/99	100	68	67.8	4.19E+12	No	0	0.26
06/01/99	100	68	80.9	3.12E+12	No	0	0
08/25/99	200	129	99.2	3.12E+12	Yes	0.14	0.03
10/12/99	100	68	83.6	2.94E+12	No	0.02	0.13
12/09/99	100	68	94.8	2.19E+12	No	0	0
02/09/00	100	68	96.5	2.04E+12	Yes	0	0
04/05/00	300	187	38.8	2.33E+13	No	0	0.22
06/13/00	100	68	90.8	2.51E+12	No	0	0
07/18/00	1400	770	96.5	2.31E+13	No	0	0
09/19/00	8000	3819	49.5	3.56E+14	Yes	3.04	0
11/09/00	100	68	84.3	2.9E+12	Yes	1	0
01/18/01	100	68	85.8	2.83E+12	No	1.22	0
03/19/01	100	68	67.8	4.19E+12	No	0	0
05/01/01	400	243	75.8	1.24E+13	No	0	0
07/10/03	300		35.5	4.06E+13	No	0.24	0
07/22/03	1800		54.4	1.49E+14	Yes	0.59	0
08/27/03	410		75.8	2.09E+13	No	0	0
09/22/03	720		16.6	1.81E+14	Yes	0	0
09/24/03	450		6.4	2.19E+14	No	0	1.03
10/22/03	500		63.5	3.34E+13	No	0	0
11/20/03	380		1.6	4.81E+14	No	no data	0.33
11/24/03	410		13.1	1.22E+14	No	0	0
12/22/03	16		17	3.93E+12	No	0	0

01/22/04	20		43.5	2.18E+12	No	0	0
01/28/04	26		47.1	2.56E+12	No	0	0
02/23/04	130		14.8	3.53E+13	No	0	0
03/16/04	800		24.1	1.5E+14	Yes	0.59	0
03/29/04	84		38.8	1.05E+13	No	0	0.13
04/26/04	560		17	1.38E+14	Yes	0	0.38
05/17/04	160		43.5	1.74E+13	No	0	0
05/25/04	630		27.9	1.05E+14	No	0	0
06/28/04	800		33.9	1.12E+14	No	0	0
07/19/04	520		47.1	5.12E+13	Yes	0	0
09/30/04	500		4.2	3.2E+14	No	0	2.68
11/09/04	50		49.5	4.66E+12	No	0	0
01/11/05	200		38.8	2.49E+13	No	0	0
03/14/05	25		17.6	6.01E+12	Yes	0.42	0
05/24/05	450		22.6	8.92E+13	No	0.08	0
07/11/05	1000		63.5	6.68E+13	No	no data	no data
09/07/05	50		75.8	2.55E+12	No	no data	no data
11/01/05	750		72.3	4.22E+13	No	no data	no data
01/05/06	25		24.1	4.69E+12	No	no data	no data

	Positive flow change with same day or prior day precipitation event.
	Negative or stable flow change with prior day precipitation event.
	<i>E. Coli</i> Data (not transformed)

Three of the twenty-seven exceedances dates had no precipitation data. The results of the study suggest that as many as 17 of the 24 violations with precipitation data (71%) could be related to runoff events.

Additional information regarding the nature of the violation can be gleaned from looking at the flow conditions under which the violations occur. Nine of the exceedances occurred during high or transitional flows. Eight exceedances, including the one requiring the highest reduction, occurred during normal flows. No exceedances occurred in the range of low flows.

Appendix F

TMDL Scenario with WLA increased by a factor of 5

The following tables represent a TMDL scenario where the WLA has been increased by a factor of five. Since the discharge is meeting water quality standards at the end of pipe, the expanded WLA has virtually no impact on nonpoint source reductions and the expanded WLA is still only 1% of the entire TMDL. This report gives Virginia flexibility to accommodate future expansions and/or additional discharges in an efficient manner.

Table A - Average annual *E. coli* loads and TMDL for Beaverdam Creek watershed (cfu/yr)

WLA[†]	LA	MOS	TMDL
6.95 x 10 ¹⁰	4.46 x 10 ¹³	(implicit)	4.46 x 10 ¹³

[†] The point sources permitted to discharge in the Beaverdam Creek watershed are presented in section 5.2.

Table B - TMDL and required reduction for Beaverdam Creek

Allowable Loads (cfu/yr)		Average Annual EC Load (cfu/yr)	Required Reduction
Waste Load Allocation (WLA)	6.95 x 10 ¹⁰		
Load Allocation (LA)	4.46 x 10 ¹³		
MOS	(implicit)		
TMDL (annual average)	4.46 x 10¹³	7.24 x 10¹⁴	94%

Table C - Average annual load distribution, reduction, and allowable load by source

	Total (cfu/yr)	Human @ 15% (cfu/yr)	Pet @ 21% (cfu/yr)	Livestock @ 27% (cfu/yr)	Wildlife @ 37% (cfu/yr)
Average Annual Load	7.24 x 10 ¹⁴	1.09 x 10 ¹⁴	1.52 x 10 ¹⁴	1.95 x 10 ¹⁴	2.68 x 10 ¹⁴
Reduction	94%	99%	99%	99%	85.5%
Allowable Annual Load	4.46 x 10 ¹³	1.09 x 10 ¹²	1.52 x 10 ¹²	1.95 x 10 ¹²	3.88 x 10 ¹³